

EXHIBIT G

UNITED STATES DISTRICT COURT

for the
Southern District of New YorkIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

See Attachment A

Case No.

23 MAG 6481

APPLICATION FOR A SEARCH AND SEIZURE WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See attachment A

located in the Southern District of New York, there is now concealed (identify the person or describe the property to be seized):

See Attached Affidavit and its Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section(s)

18 U.S.C. §§ 201, 219, 371, 641, 951, 1001,
1503, 1512, 1343, 1344, 1346, 1349, 1951,
1956, 1957; 22 U.S.C. §§ 612 and 618(a)(1)

Offense Description(s)

Bribery, wire fraud, honest services fraud, extortion under color of official right, money laundering, false statements, obstruction of justice, public official acting as foreign agent, acting as agent of a foreign government without prior notification to the Attorney General, FARA, bank fraud, theft of government property, and conspiracy to do the above

The application is based on these facts:

See Attached Affidavit and its Attachment A

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

2/28/24 10:16 AM

City and state: New York, NY

Applicant's signature

Special Agent Ryan Larkin

Printed name and title

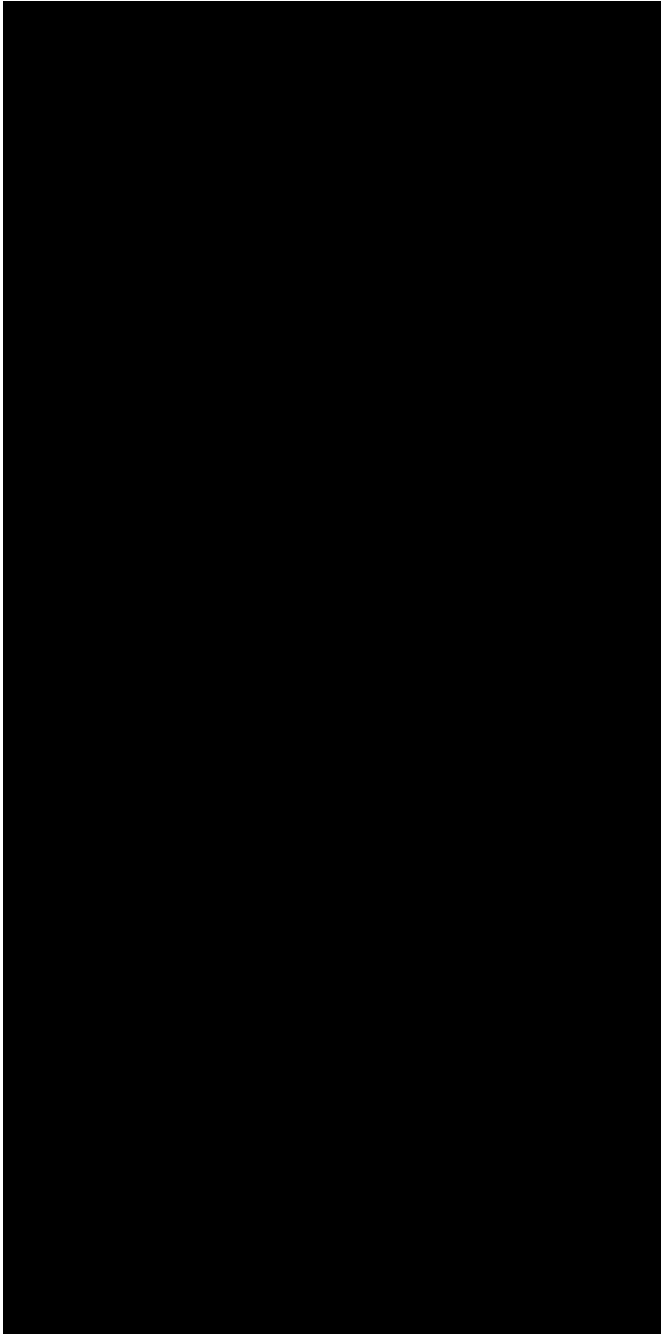
Judge's signature

The Honorable Jennifer E. Willis

Printed name and title

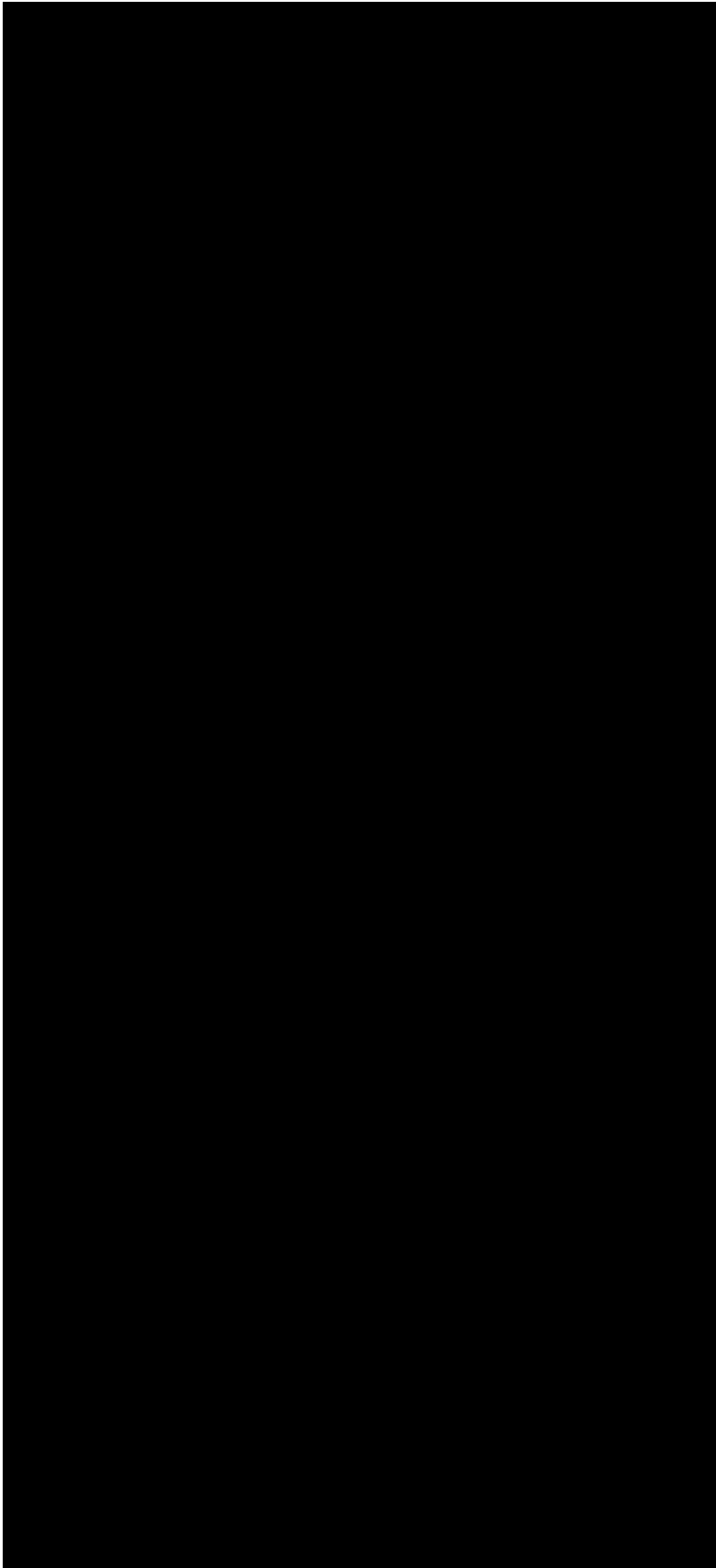
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of the United States of America for a Search and Seizure Warrant for the Following Electronic Devices in the Custody of the Federal Bureau of Investigation in New York:

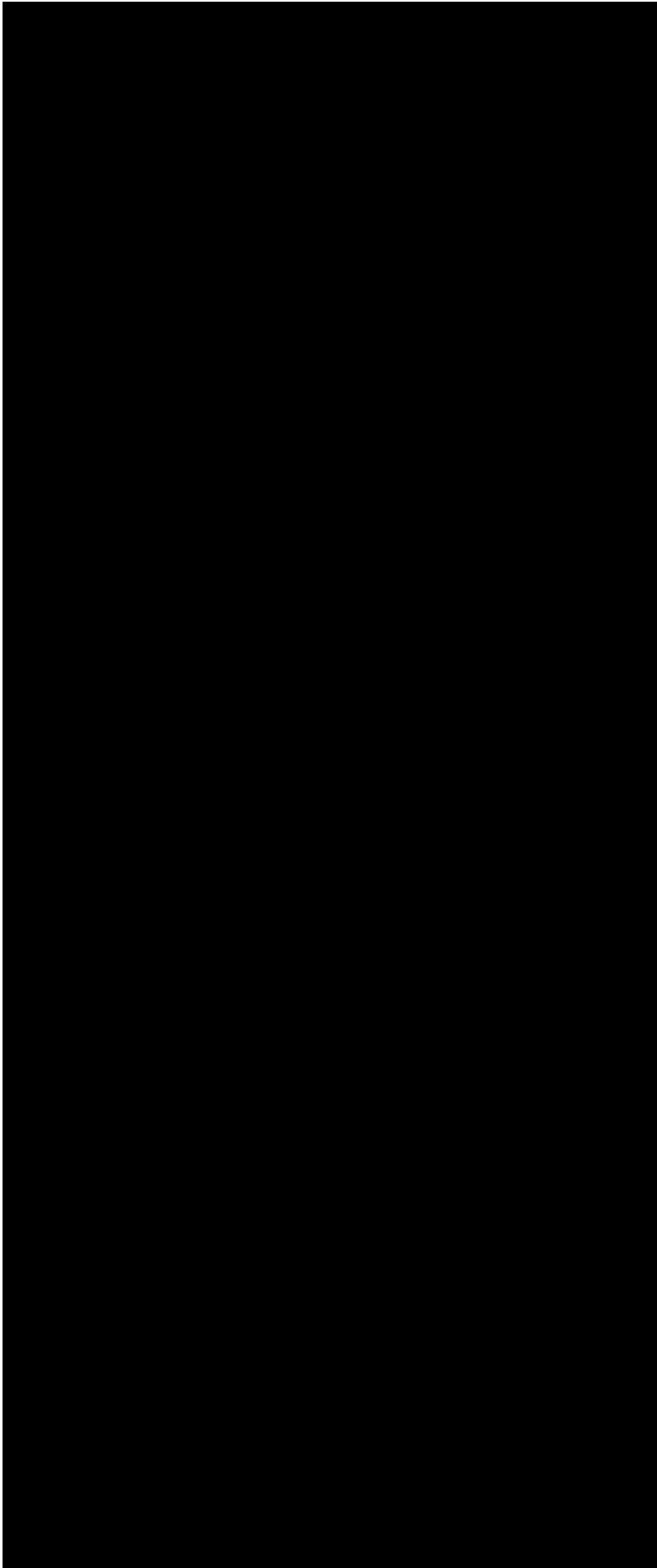


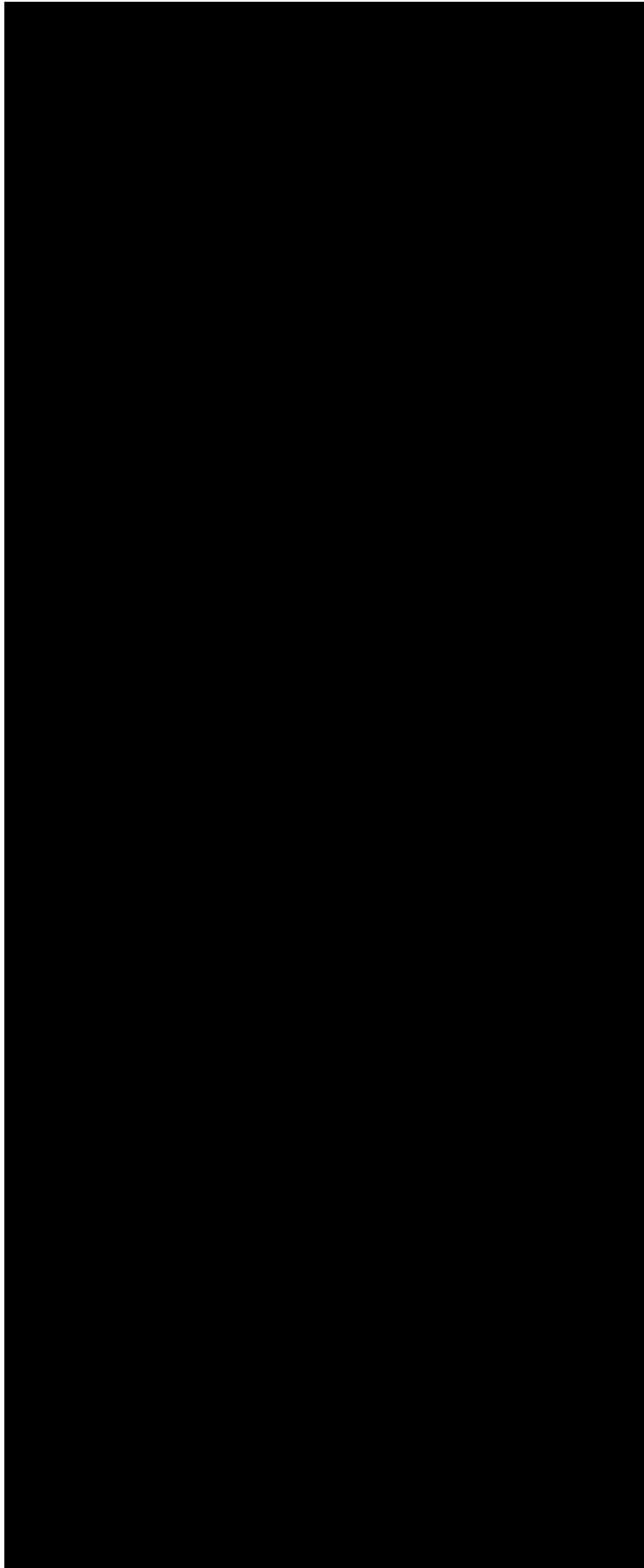
TO BE FILED UNDER SEAL

**Agent Affidavit in Support of
Application for Search and Seizure
Warrant**

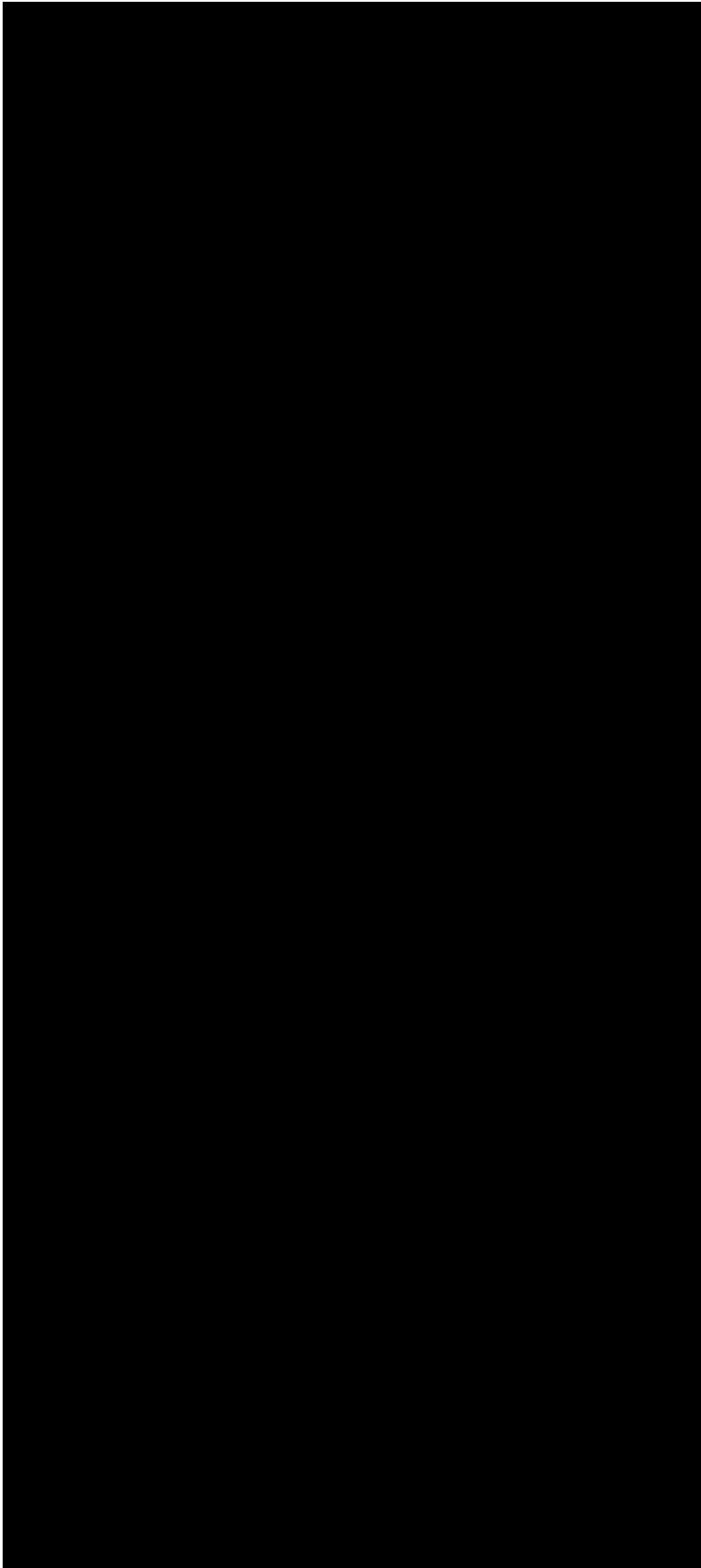


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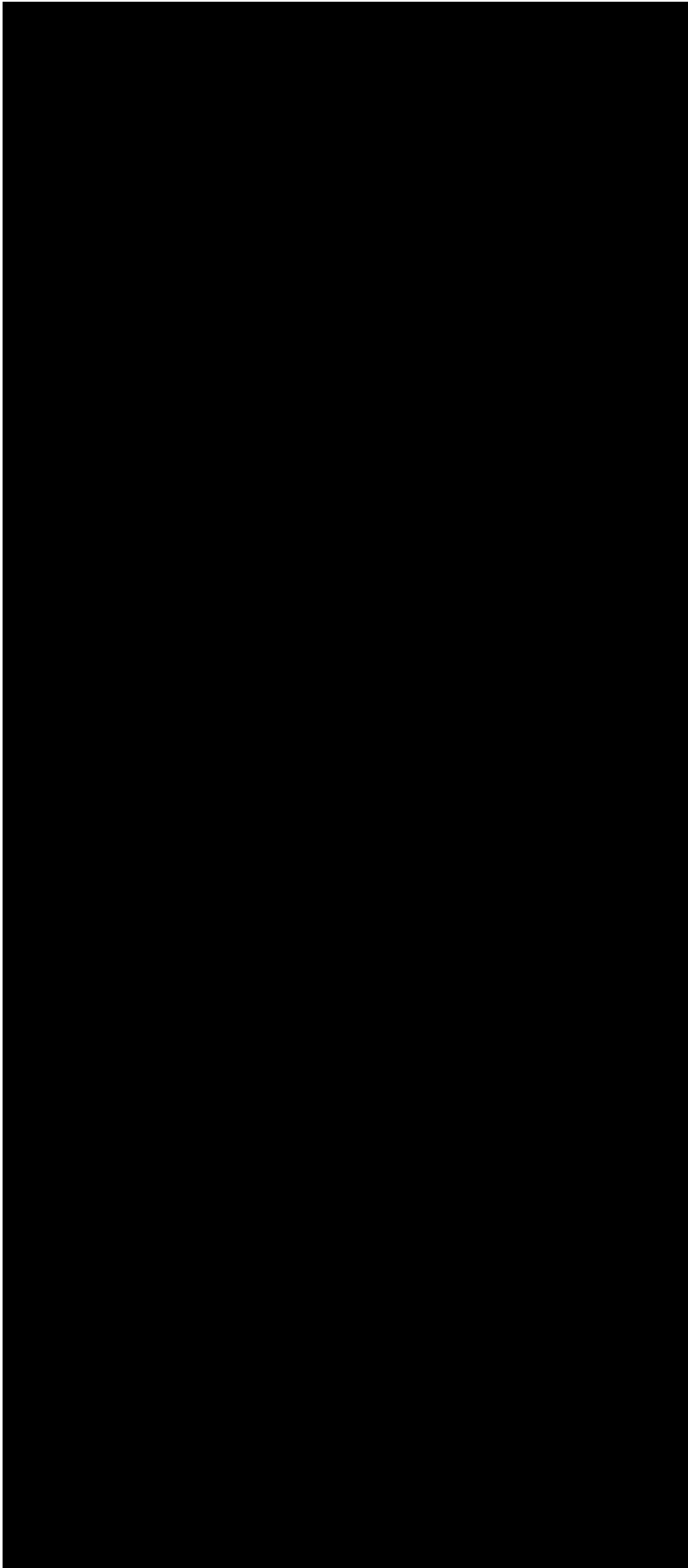
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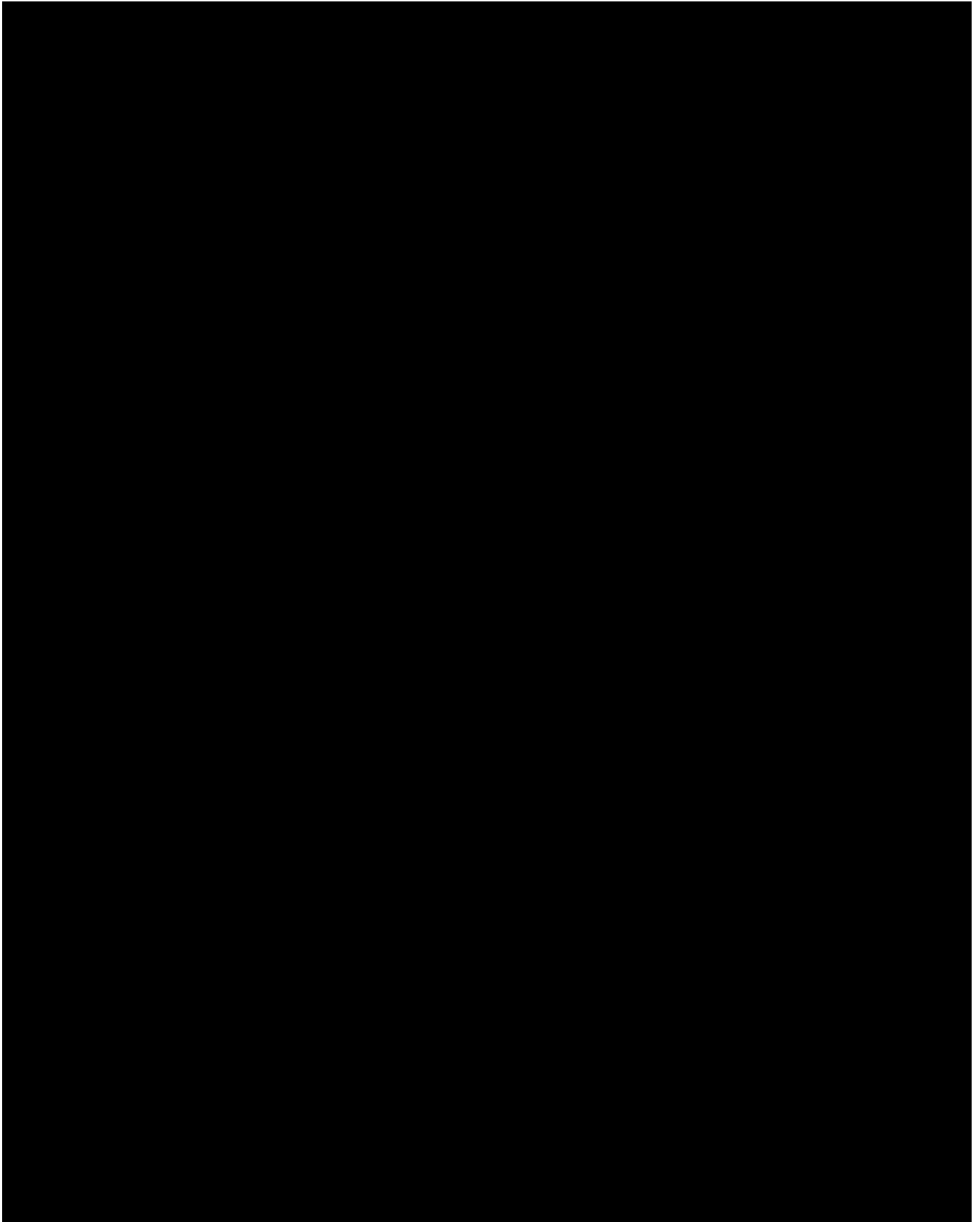


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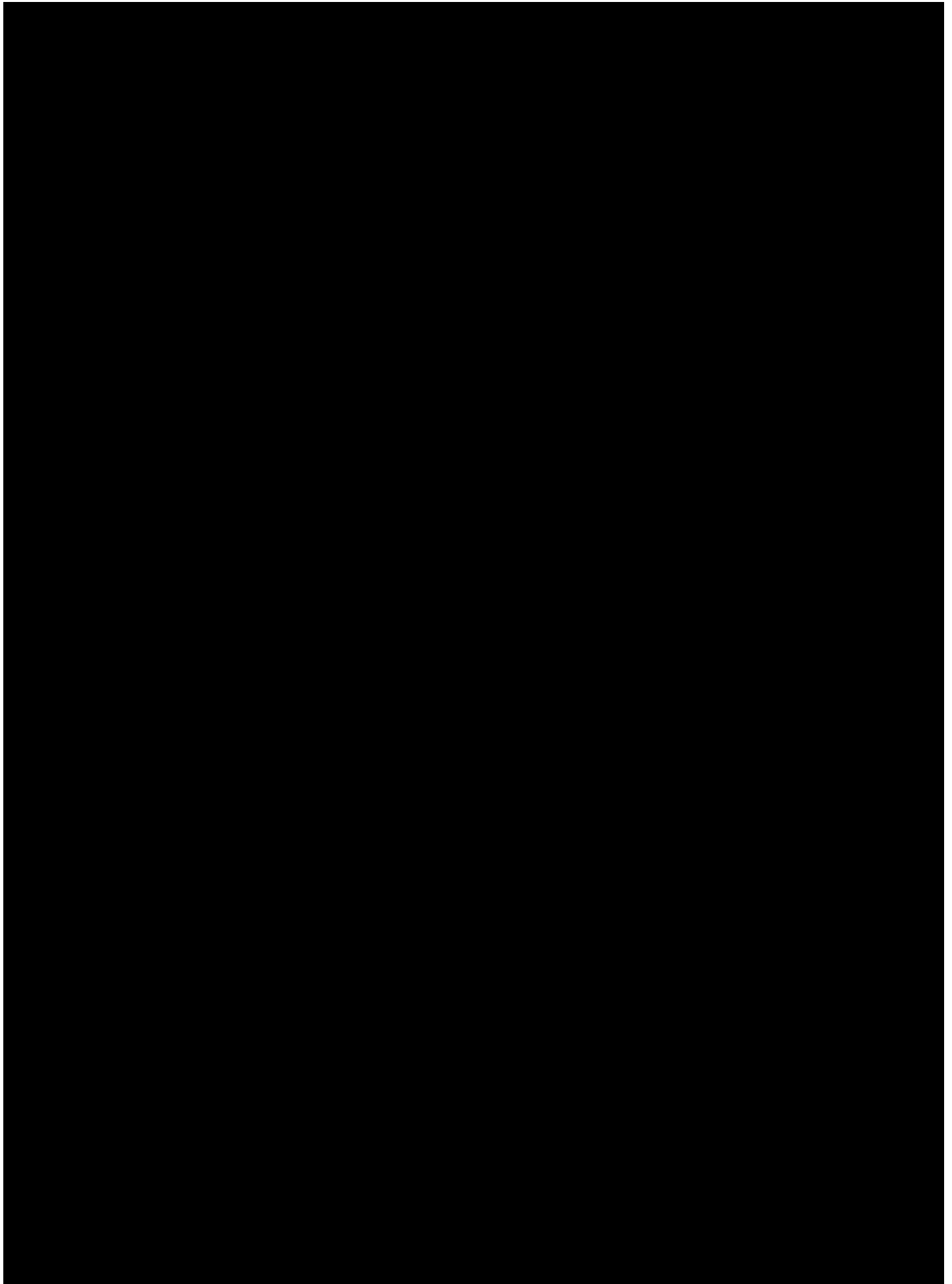


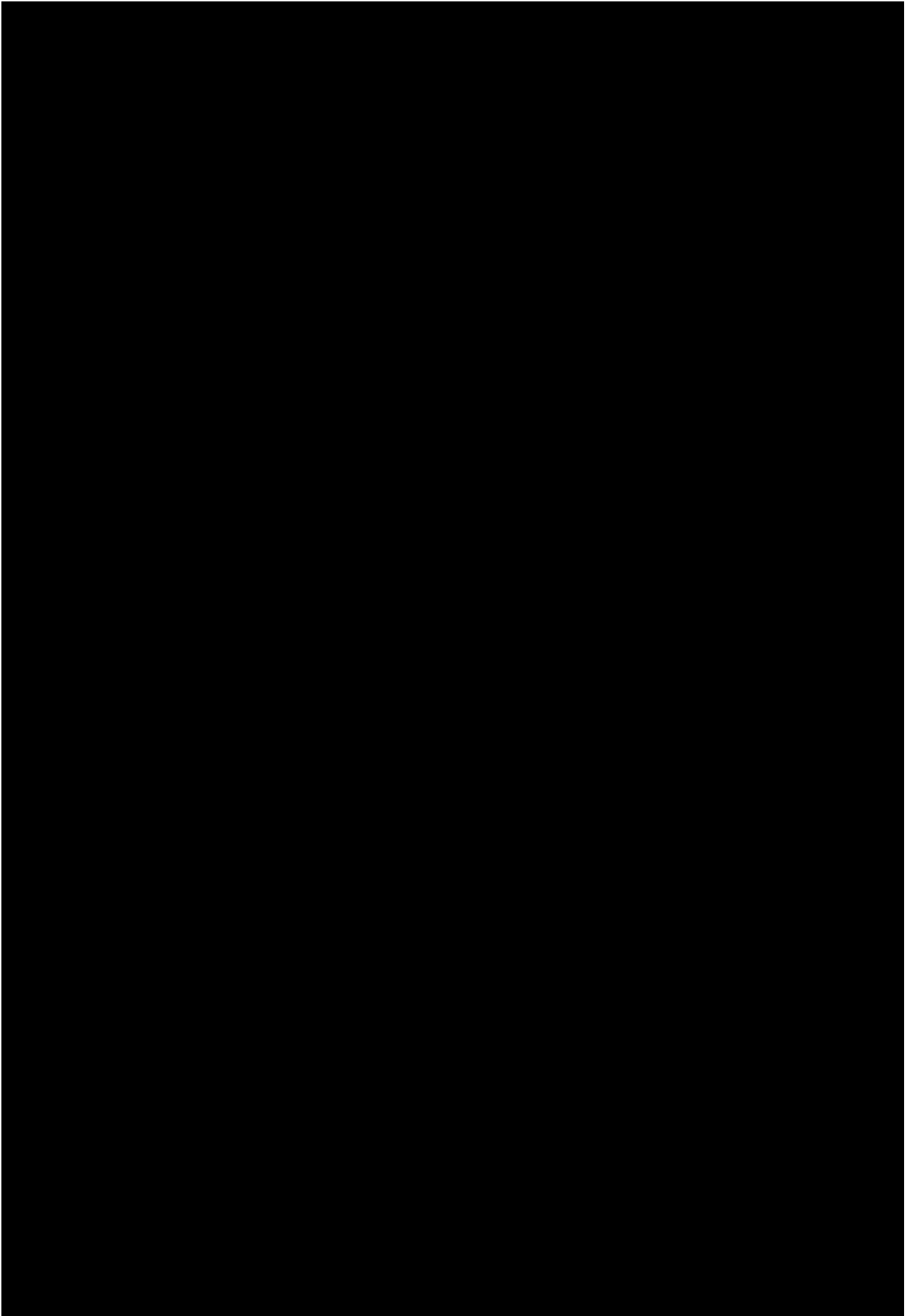
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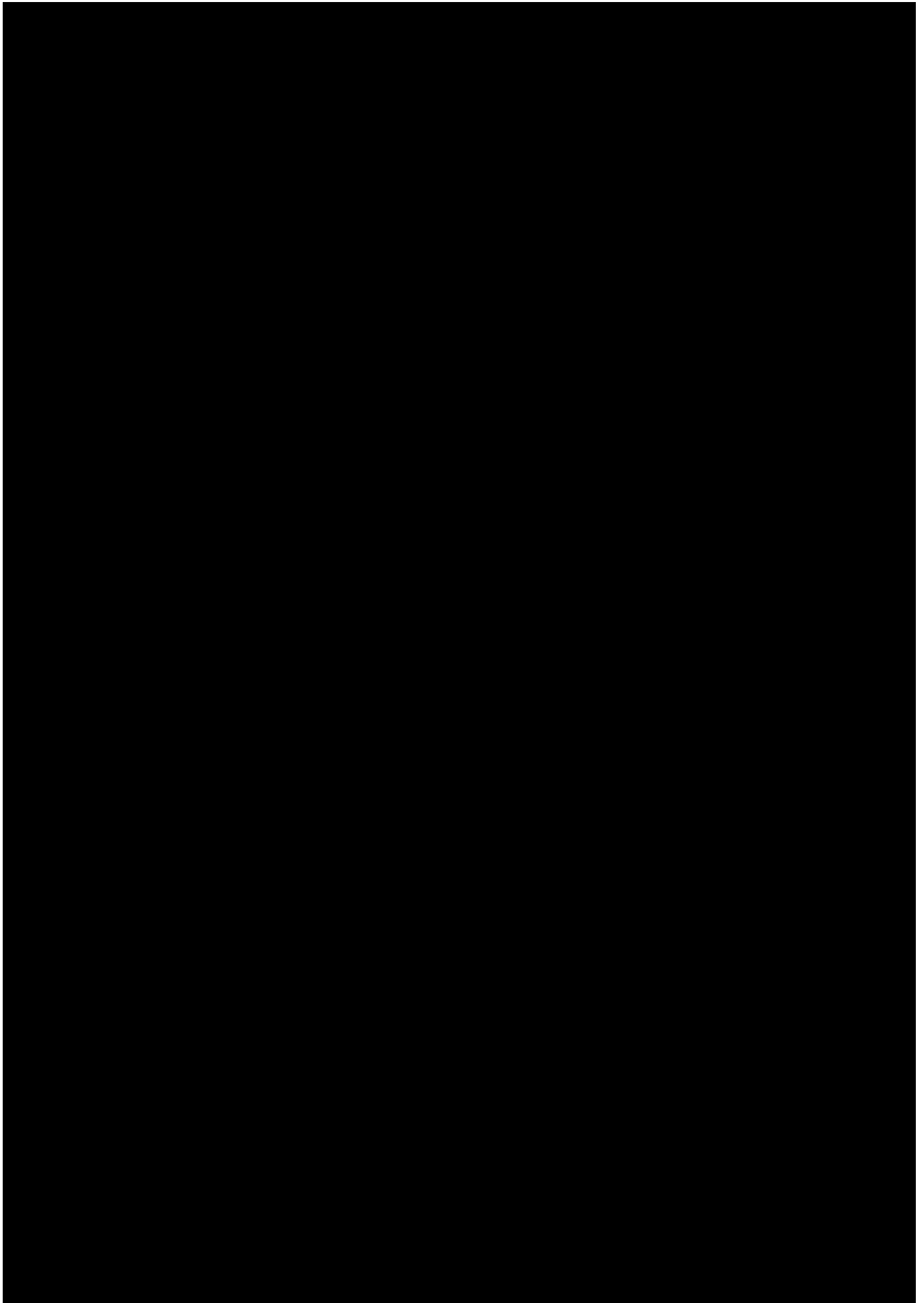


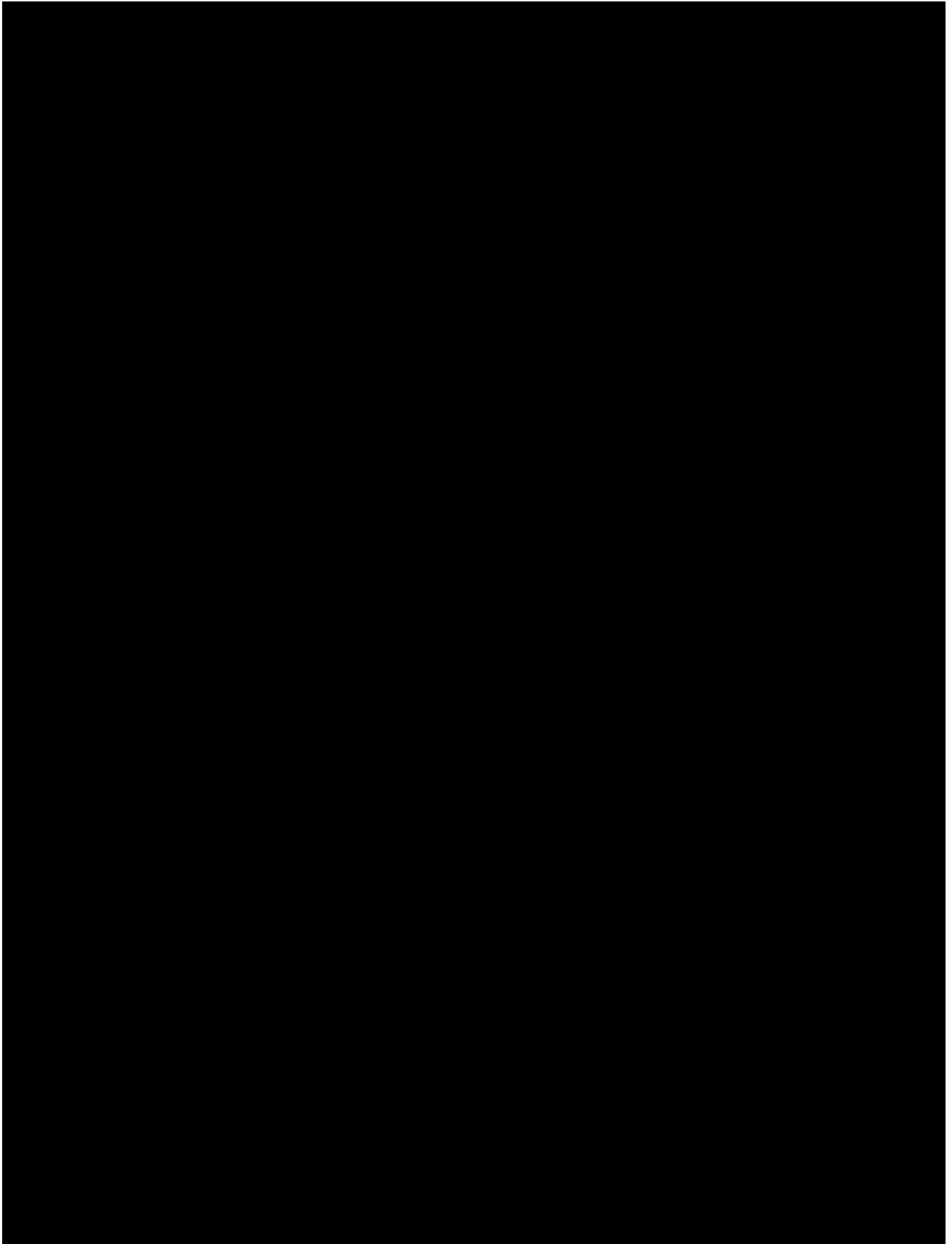


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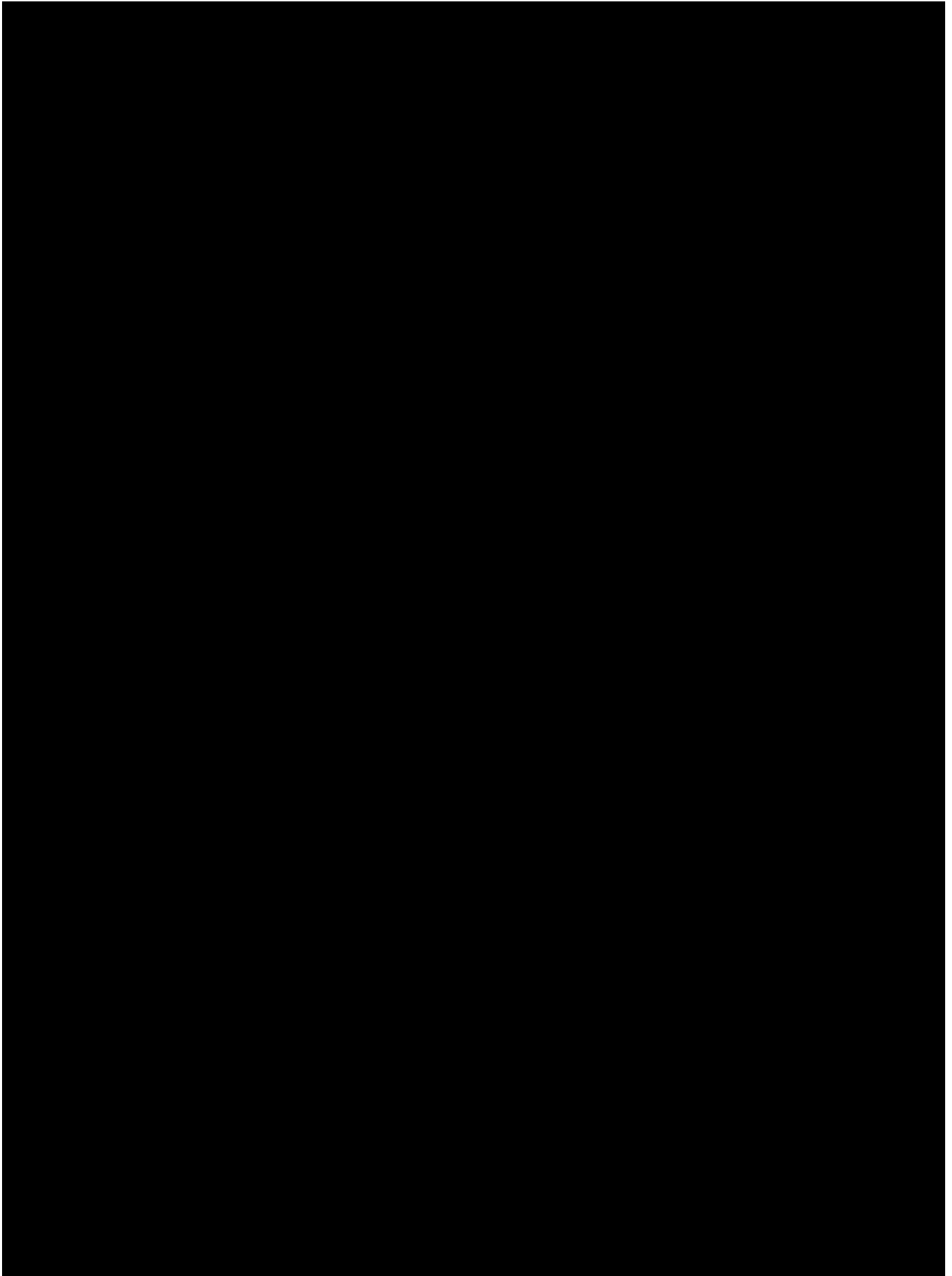


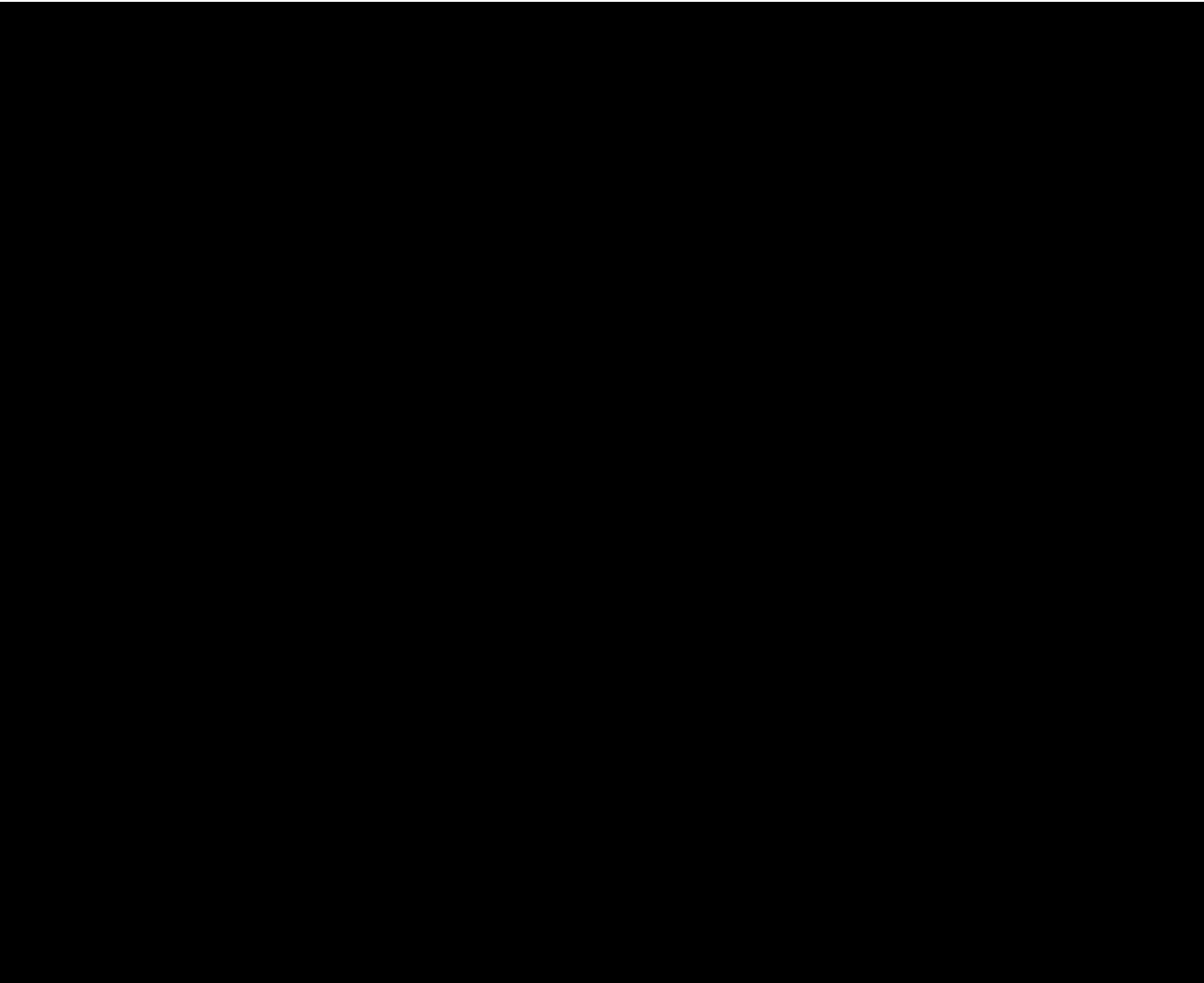






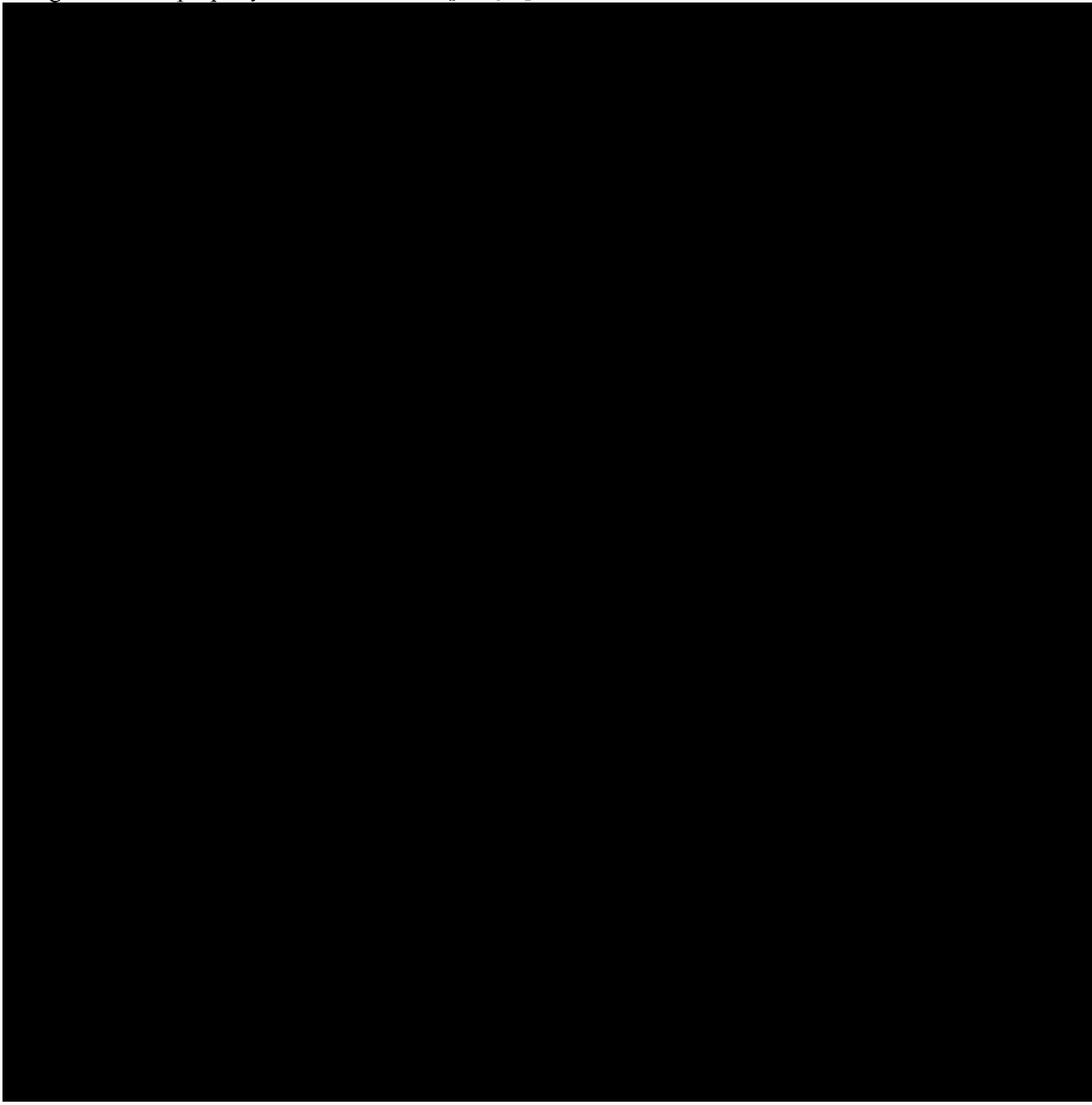
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6. As set forth below, the investigation giving rise to this warrant application has been ongoing for multiple years and has involved the execution of a number of search warrant applications throughout this period. As the investigation has progressed, the investigative team's understanding of the suspected conduct has grown (including by the ongoing review of the Subject Devices pursuant to the applicable warrants) and has led to the identification of additional suspected offenses for which warrants were sought, ultimately resulting in the Subject Offenses set forth here. As set forth in paragraphs 30-42, below, each of the Subject Devices was seized, or contains data obtained, pursuant to search warrants that specified only a subset of the Subject

Offenses listed herein. For example, as set forth in paragraphs 30-39, below, the warrants applicable to many of the Subject Devices did not specify the false statements or obstruction of justice offenses listed in paragraph 5.v-vi, above. None of the warrants applicable to any of the Subject Devices specified the public official as foreign agent offenses, bank fraud, or theft of government property offenses listed in paragraphs 5.vii-ix, above.





10. As set forth below, the Subject Offenses relate to a suspected scheme by several individuals to provide things of value to Nadine Arslanian, a/k/a Nadine Menendez (“Arslanian”), the now wife of U.S. Senator Robert Menendez,¹ and to Menendez, in exchange for promises of Menendez’s influence in attempting to secure a favorable resolution of a New Jersey state criminal prosecution then pending against an associate of two of the individuals, a state criminal investigation then pending against another associate of one of the individuals, and a federal criminal prosecution against another of the individuals; his influence in authorizing foreign military sales and grants of foreign military financing to Egypt; and his influence in pressuring the U.S. Department of Agriculture to acquiesce to Egypt’s grant of a monopoly in halal certification to one of the individuals; as well as his influence in obtaining municipal COVID-19 testing contracts and/or other authorization to a company owned by one of the bribe-payors; and in

¹ As set forth below, the things of value were provided both before and after Arslanian married Menendez. Because the majority of the events recounted herein took place before Arslanian married Menendez and changed her name to Nadine Menendez, she is referred to as “Arslanian” herein.

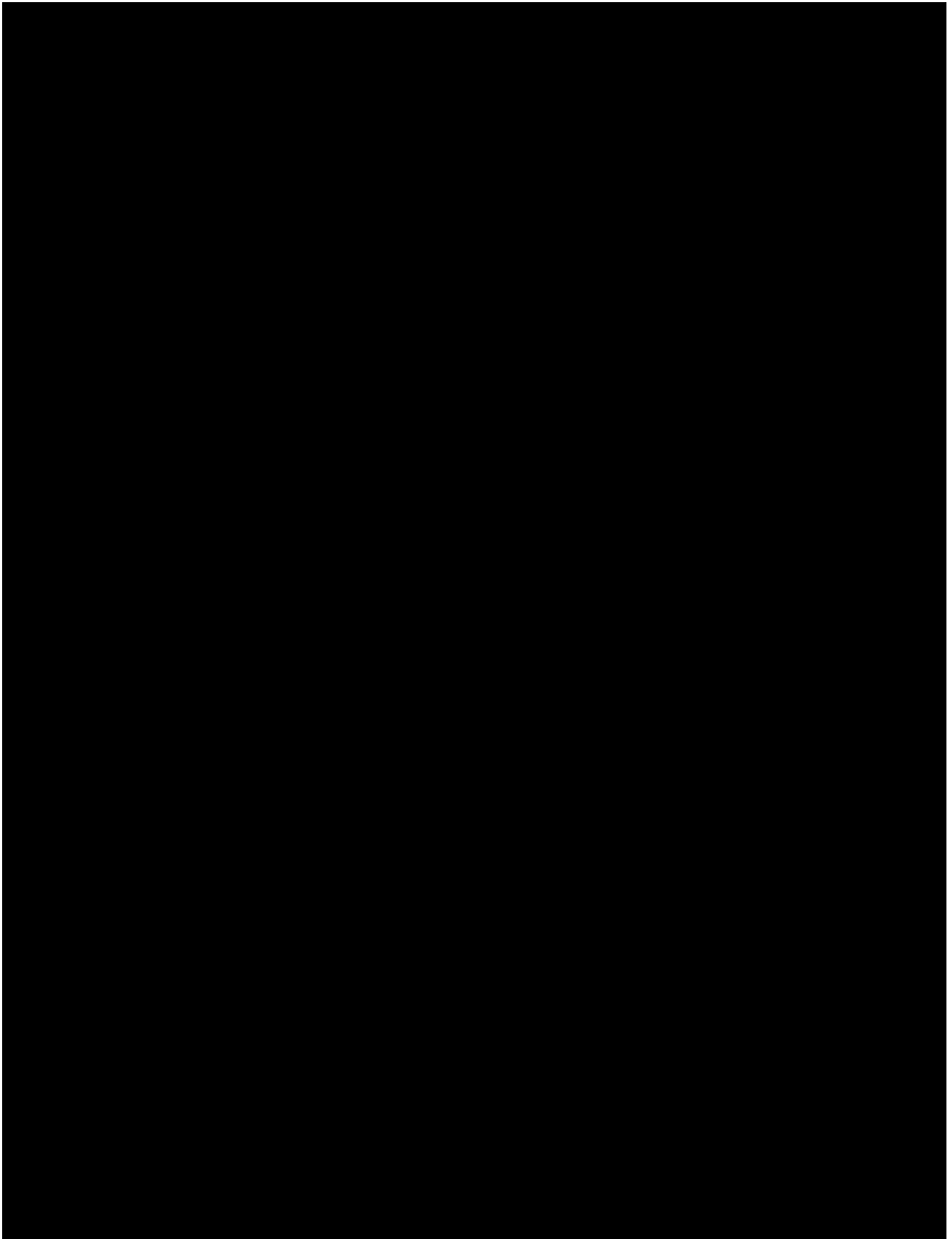
exchange for Menendez taking other official acts as well, and to induce Menendez to act as an agent of the Arab Republic of Egypt ("Egypt") while serving as a United States Senator.²

[REDACTED]

13. [REDACTED] was at all relevant times a businessman associated with the company [REDACTED] and as set forth in paragraph 26 below, was prosecuted by the State of New Jersey for workers' compensation insurance fraud related to this company. In addition, at all relevant times [REDACTED] was also associated with the company [REDACTED] [REDACTED] for which he has been listed on the company's website as its President.

[REDACTED]

² The facts set forth herein are drawn from case documents and information known to law enforcement agents and other government personnel involved in the investigation, of which I have knowledge based on my review of materials and discussions with those involved in the investigation.



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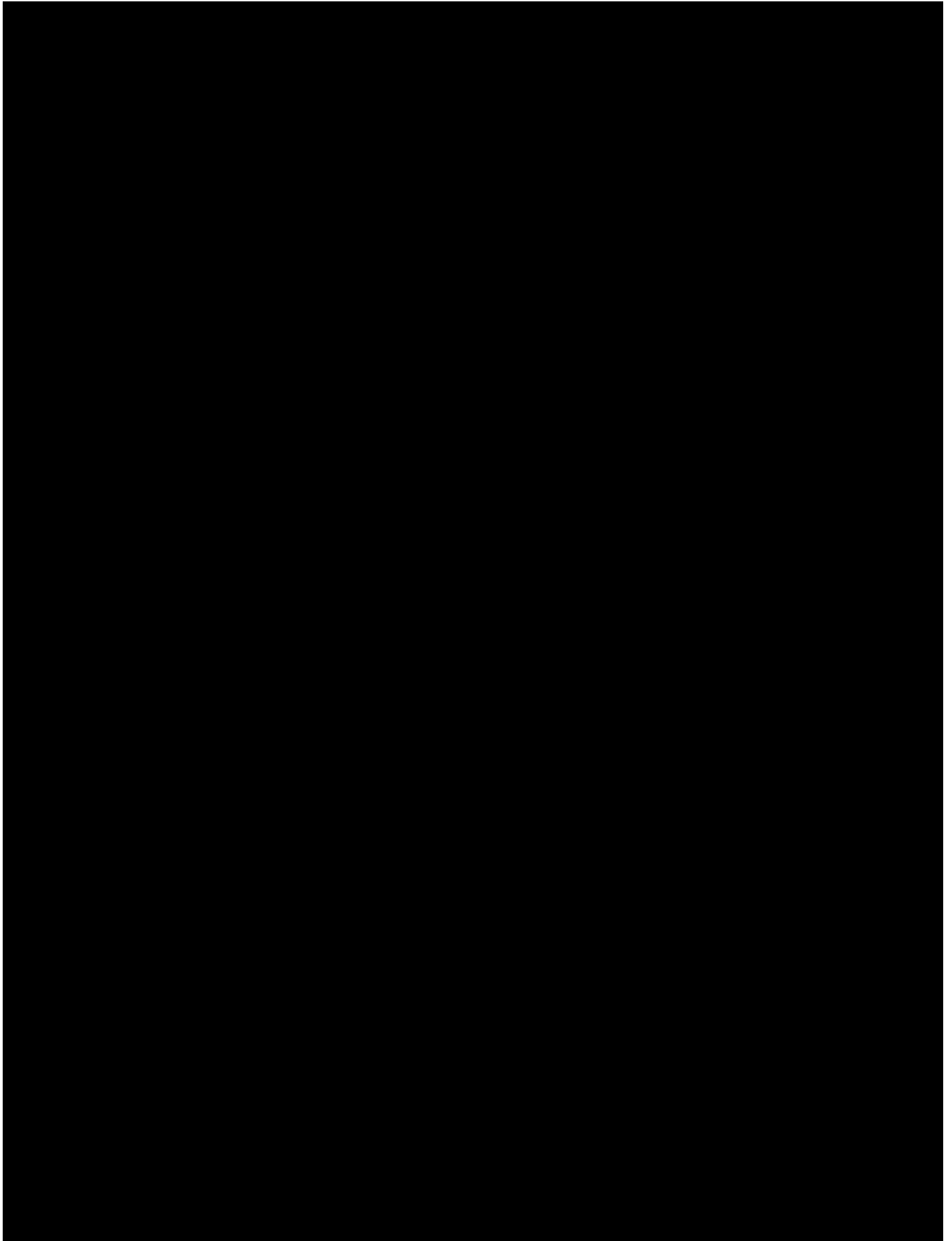
[REDACTED]

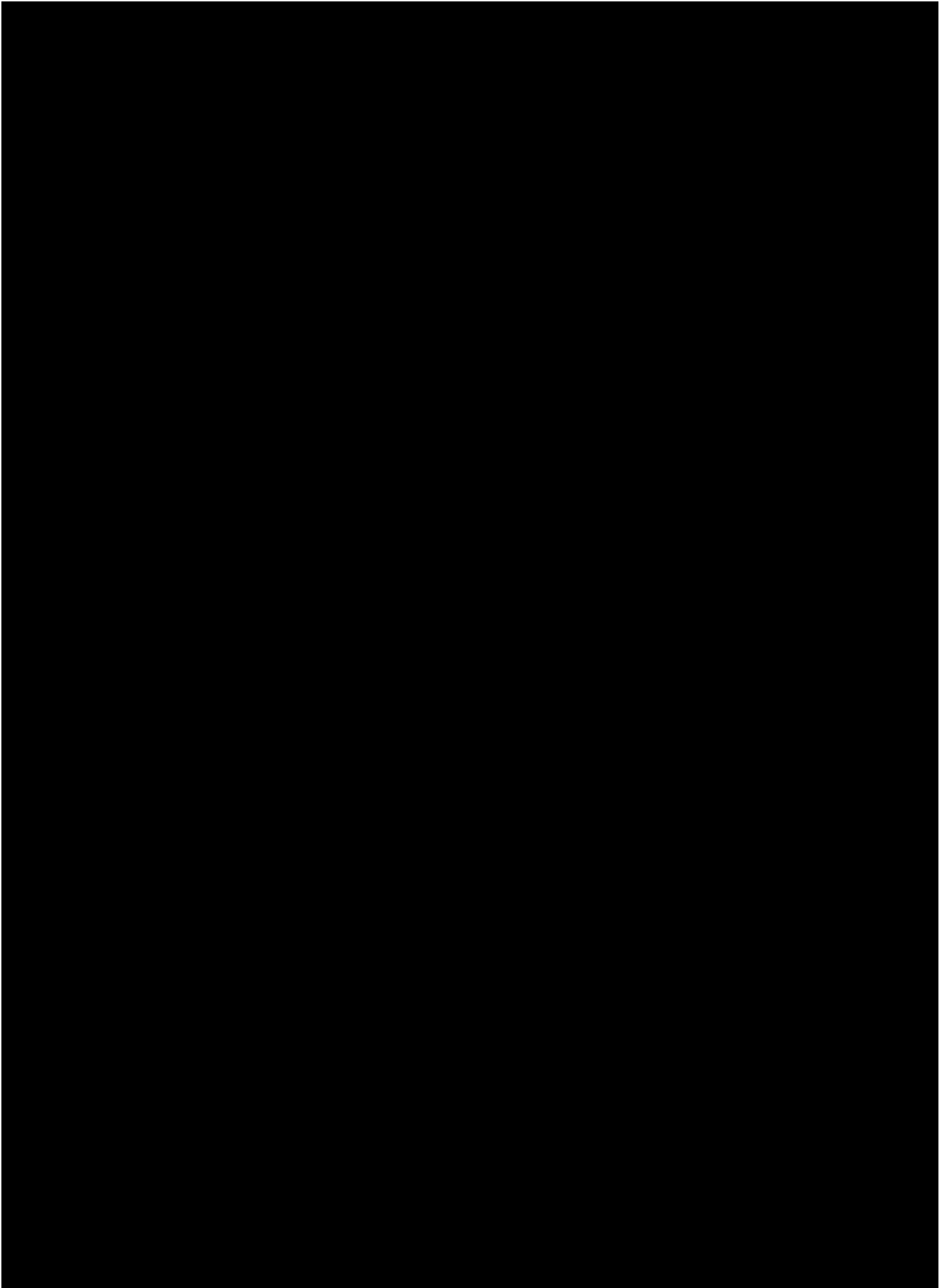
19. [REDACTED] is a business associate of Uribe who, as discussed in paragraphs 52.y, 52.z, and 59, was involved in Uribe's making payments on the loan for the Mercedes-Benz Automobile.

20. [REDACTED] is the owner and [REDACTED] a biomedical testing company. As set forth in paragraphs 65-66, [REDACTED] apparently worked with [REDACTED] (an individual described in the next paragraph below) in 2020 and 2021 to have [REDACTED] pay tens of thousands of dollars to Arslanian and the Arslanian Company, apparently in exchange for Menendez using his influence to secure for [REDACTED] contracts and/or other authorization with various New Jersey municipalities to perform COVID-19 testing.

21. [REDACTED] was at relevant time periods a business associate of both Hana and [REDACTED]. As set forth below, [REDACTED] appears to have provided carpeting, home improvement services, and tangible gifts to Arslanian and Menendez; in August 2019, [REDACTED] described aspects of the bribery scheme to a confidential source (the "CS") in a recorded conversation; and [REDACTED] received funds from [REDACTED] and apparently was involved in making certain of [REDACTED] payments to the Arslanian Company.

[REDACTED]







27. Based on my conversations with other law enforcement personnel and my review of law enforcement reports, I have learned that in or about August 2019, *i.e.*, shortly after the plea and sentencing described above,⁶ the CS met with [REDACTED] and the following conversation, which was consensually recorded by the CS at the direction of law enforcement,⁷ occurred, in substance and in part:

a. [REDACTED] told the CS that Hana arranged for Arslanian to receive a ring and a Mercedes-Benz automobile in exchange for Menendez's assistance in resolving criminal charges for insurance fraud pending against an American male.⁸

b. [REDACTED] discussed how the criminal case "needed a push," and "without" the push the man "would have gotten three years imprisonment," but the "push made the man avoid the three years."

information, I have learned the authorized penalties for second-degree charges in New Jersey are higher than those for third-degree charges, and therefore I understand that [REDACTED] plea agreement dismissed the two charges carrying the highest penalties and allowed a plea to a charge carrying a lower penalty, along with a recommendation of a non-incarceratory sentence.

⁵ The contents of the [REDACTED] Email Account reflect that on January 26, 2021, a probation officer emailed [REDACTED] a probation discharge letter, which [REDACTED] then forwarded to the [REDACTED] Email Account. Two days prior to this—*i.e.*, on January 24, 2021—an accountant had sent the [REDACTED] Email Account and the [REDACTED] Email Account a copy of a contract effecting the sale of [REDACTED] to the [REDACTED], which sale contract was dated January of 2016.

⁶ It appears, based on the investigation, that [REDACTED] and Hana had a financial dispute prior to this conversation.

⁷ As noted in the affidavit in support of prior warrants in the case, *see* Ex. A at 17 n.3, the CS has been assisting law enforcement in exchange for monetary compensation, and has provided information that has proven reliable, some of which has been independently corroborated.

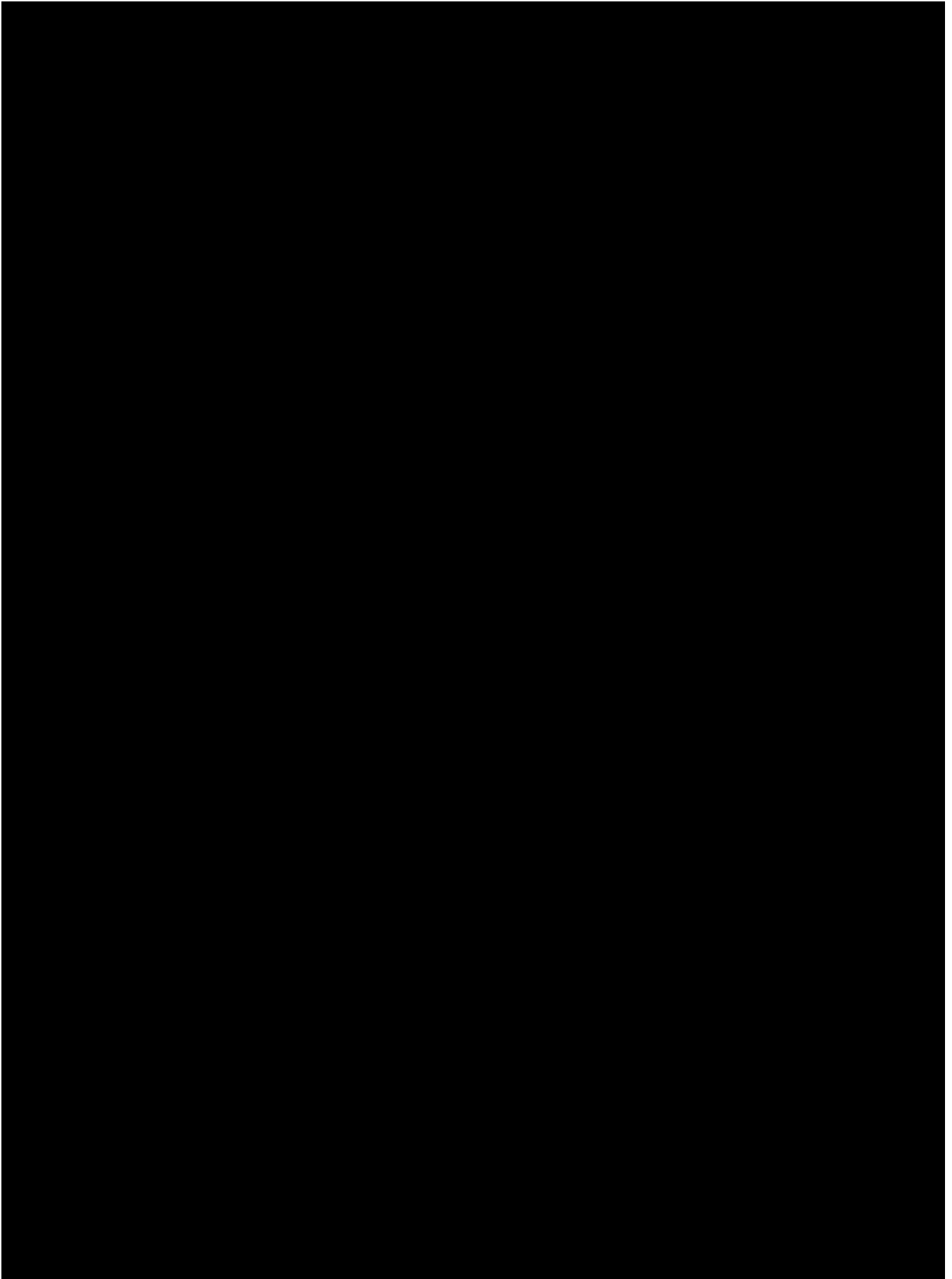
⁸ These communications took place mainly in Arabic, and the description of them is based on a review of a draft summary and translation, subject to revision.

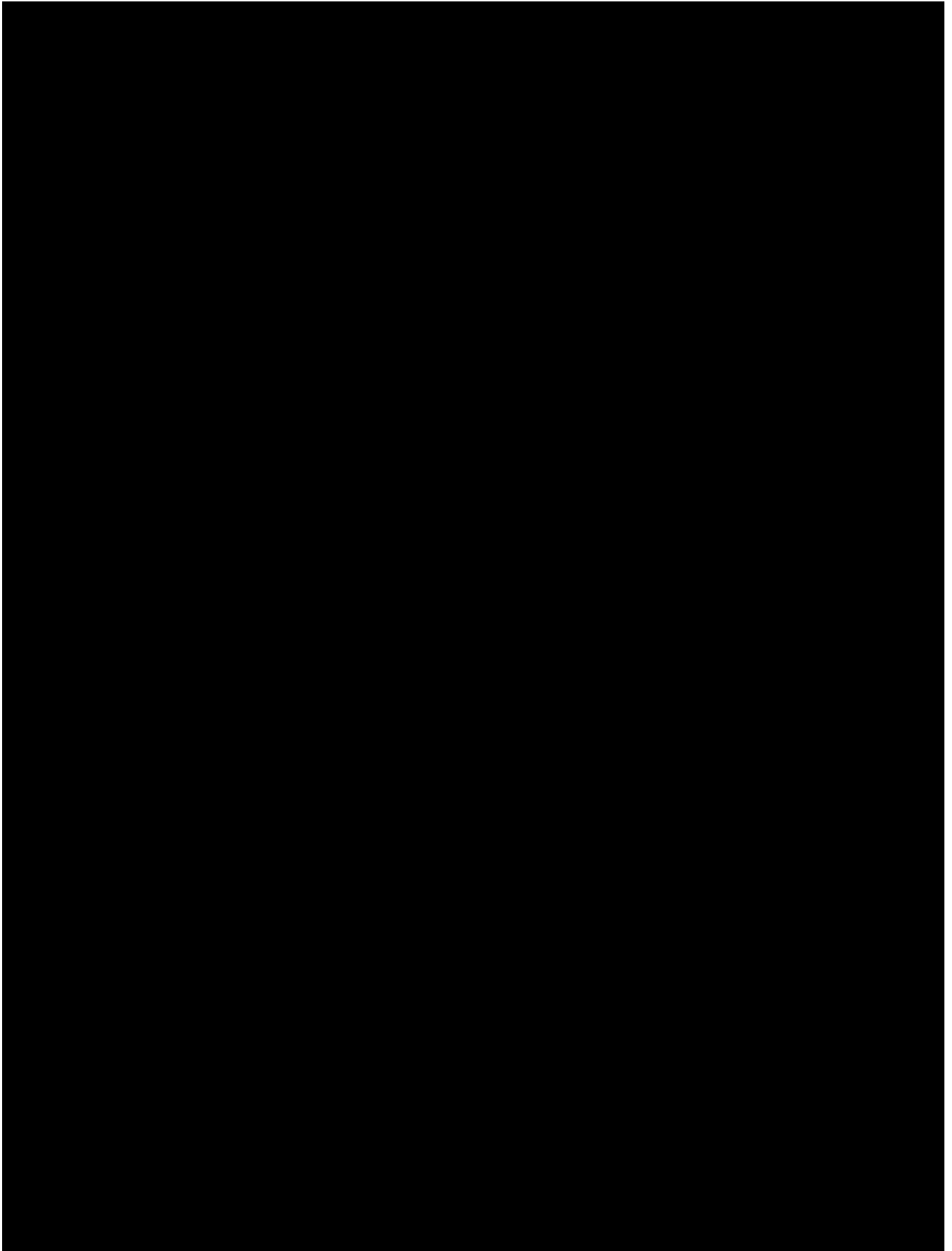
c. [REDACTED] further told the CS that the American male gave Hana \$150,000 and that Hana then purchased the engagement ring for Menendez's girlfriend, along with a car, and kept the remaining money for himself. As detailed further below, I understand that the "American male" is a reference to [REDACTED]⁹ and the reference to Menendez's girlfriend is a reference to Arslanian.¹⁰

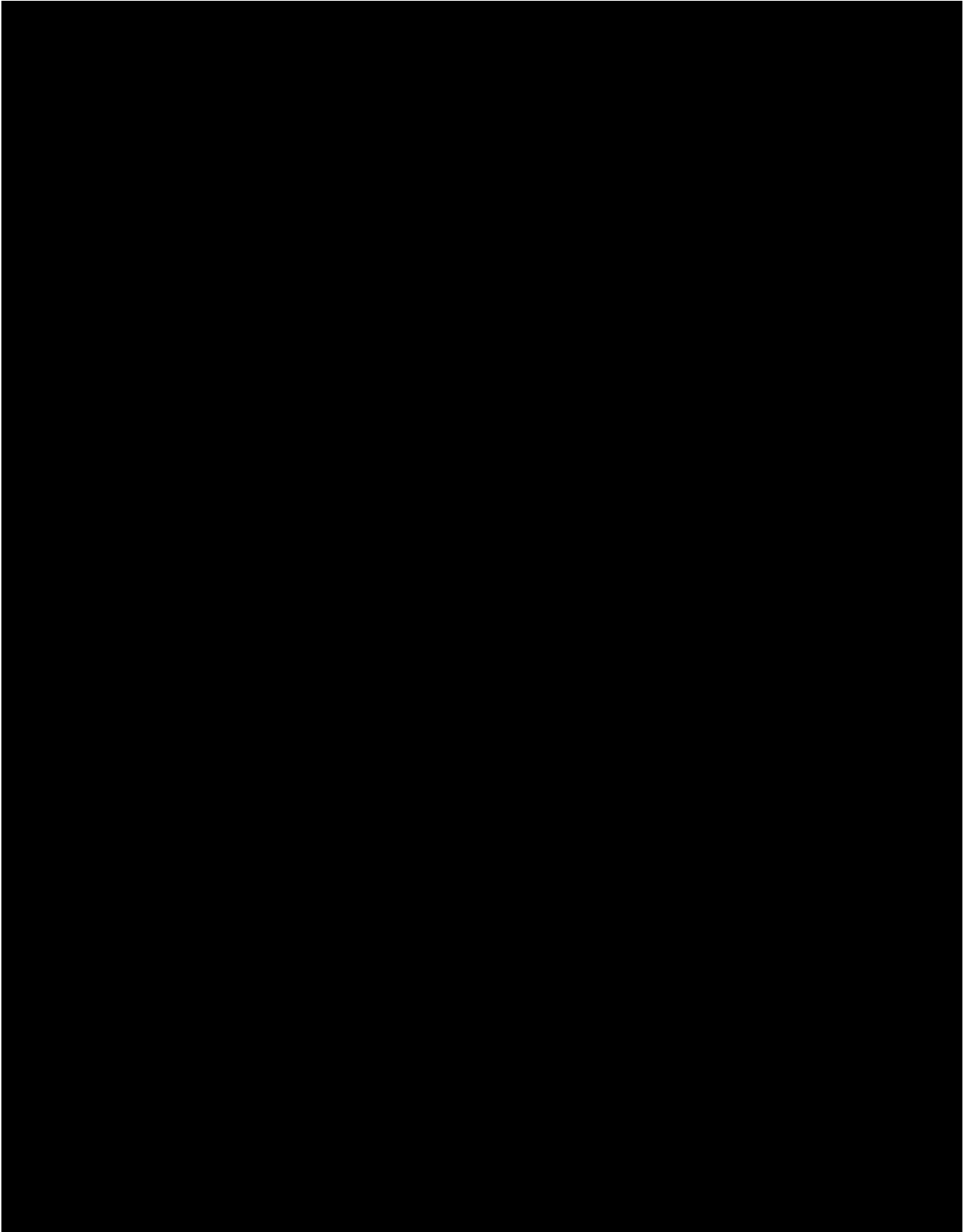
[REDACTED]

⁹ As noted below, the evidence indicates that the funds to purchase the Mercedes-Benz Automobile were provided by Uribe and by [REDACTED] business partner [REDACTED]

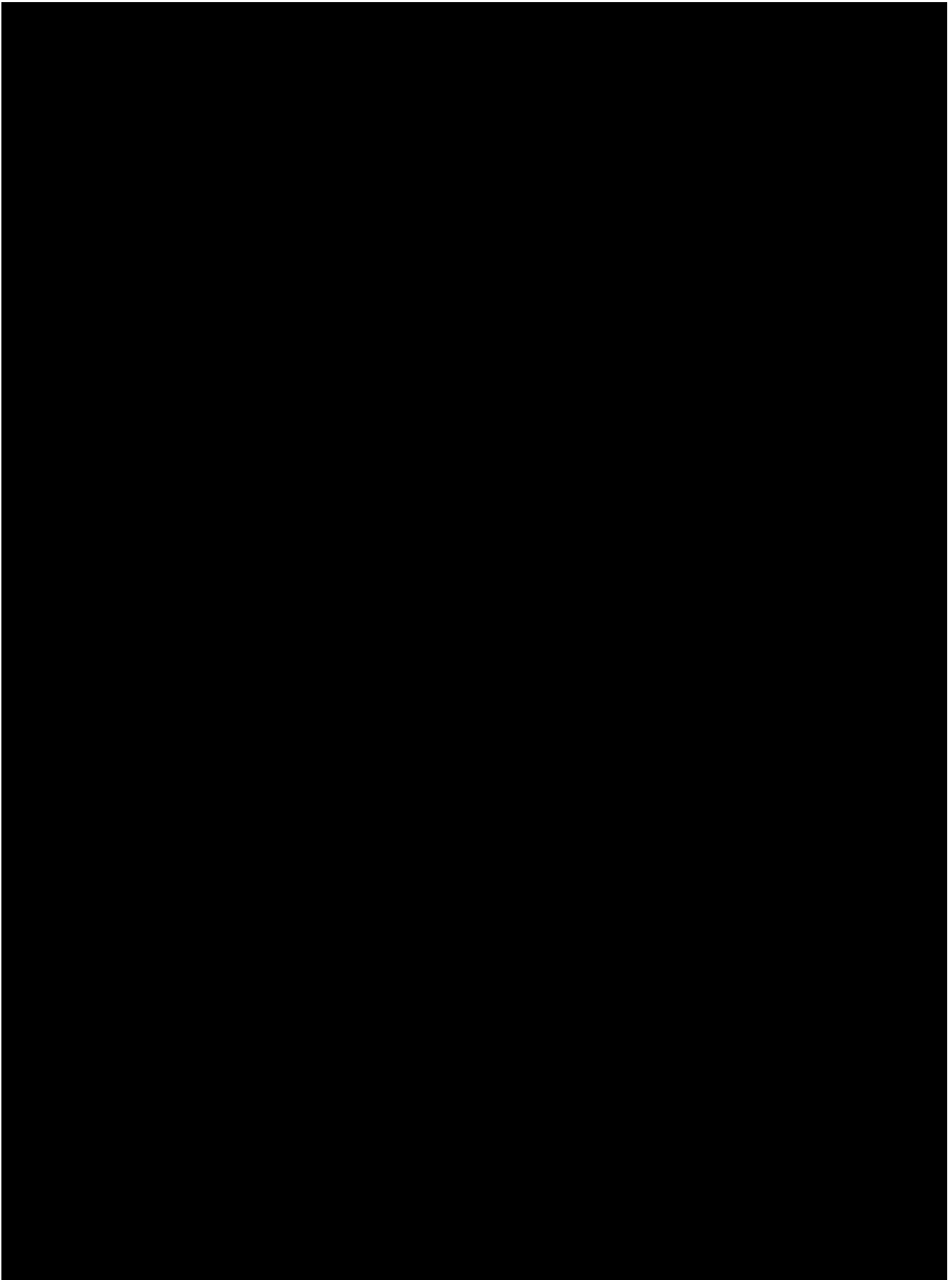
[REDACTED]

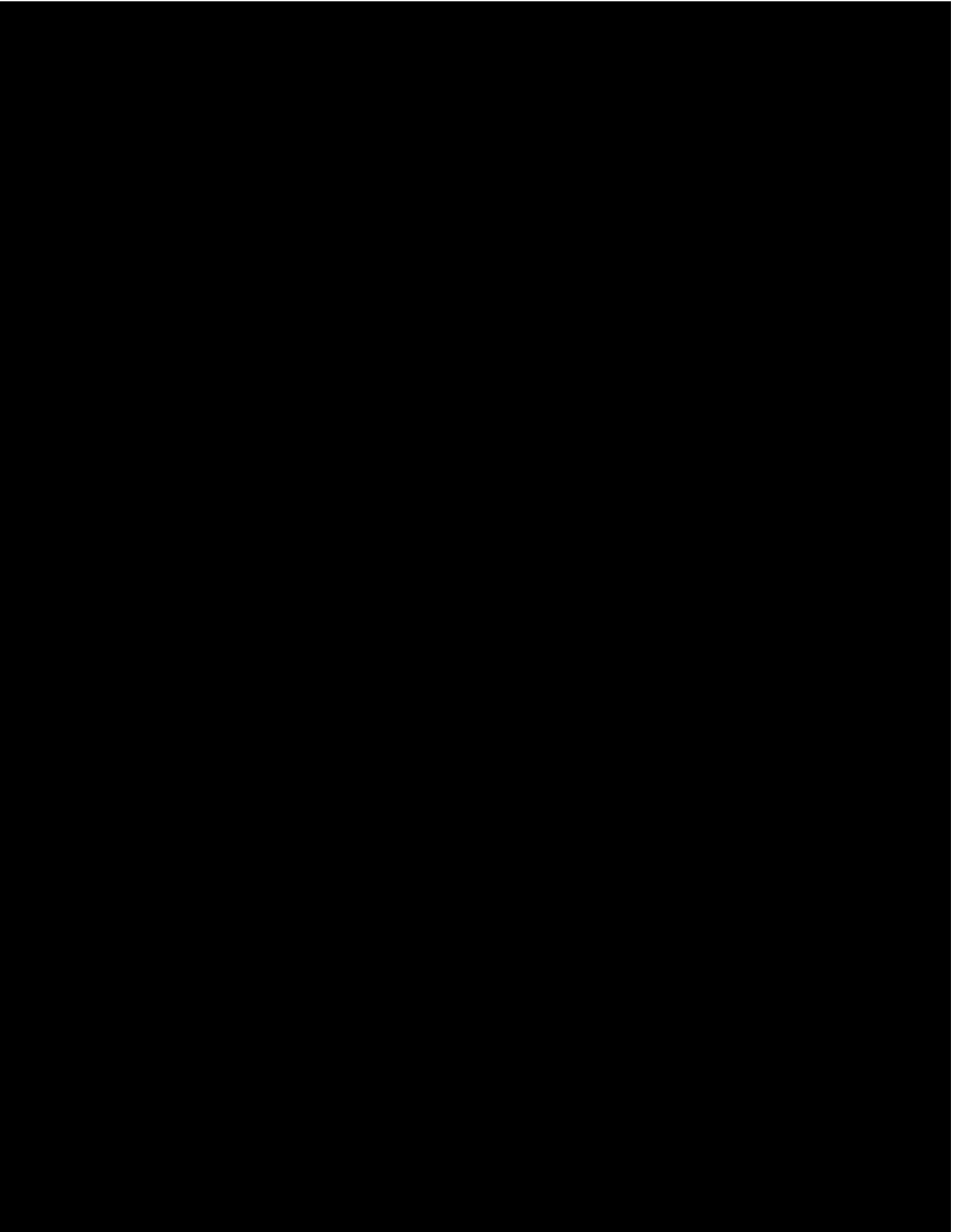




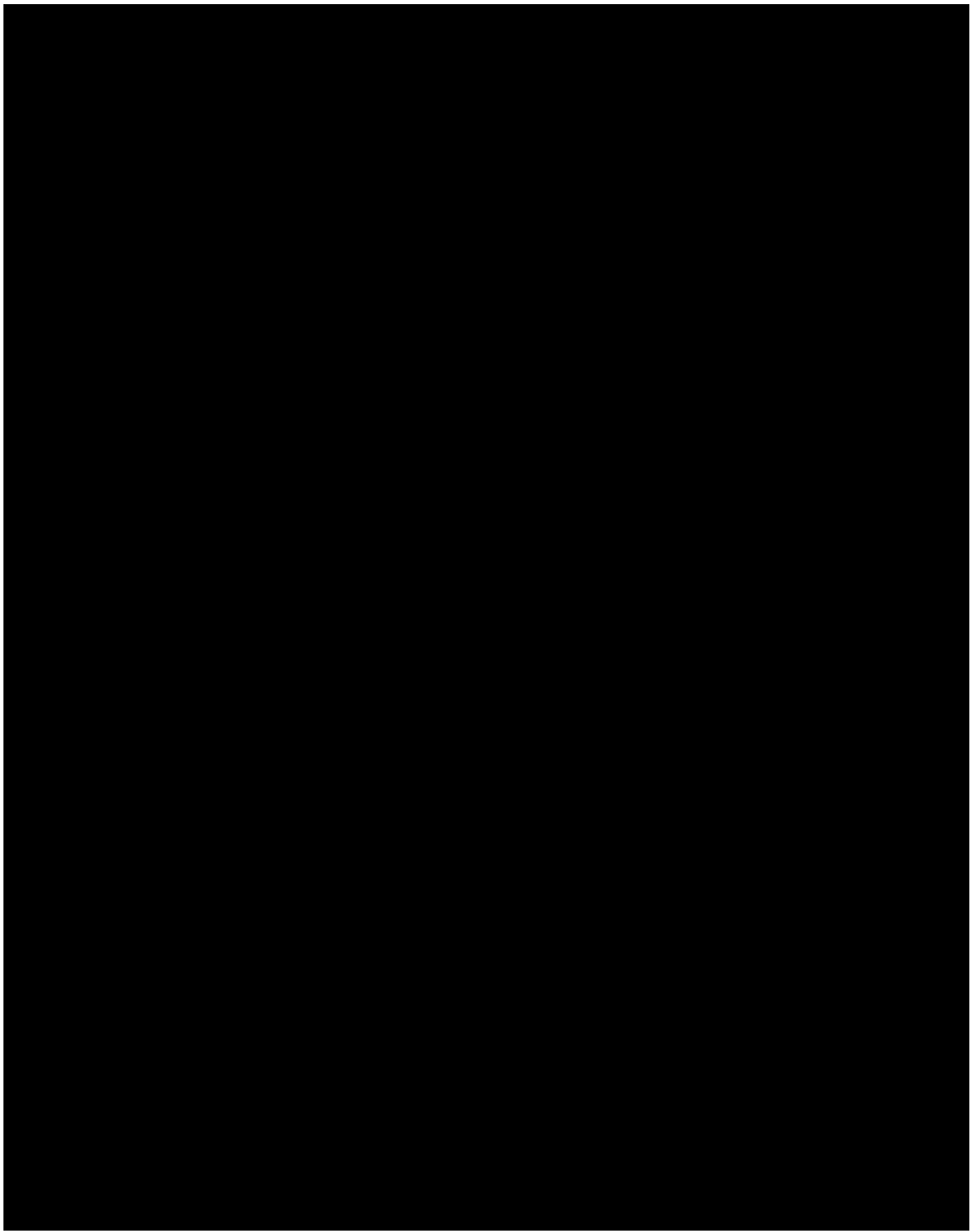


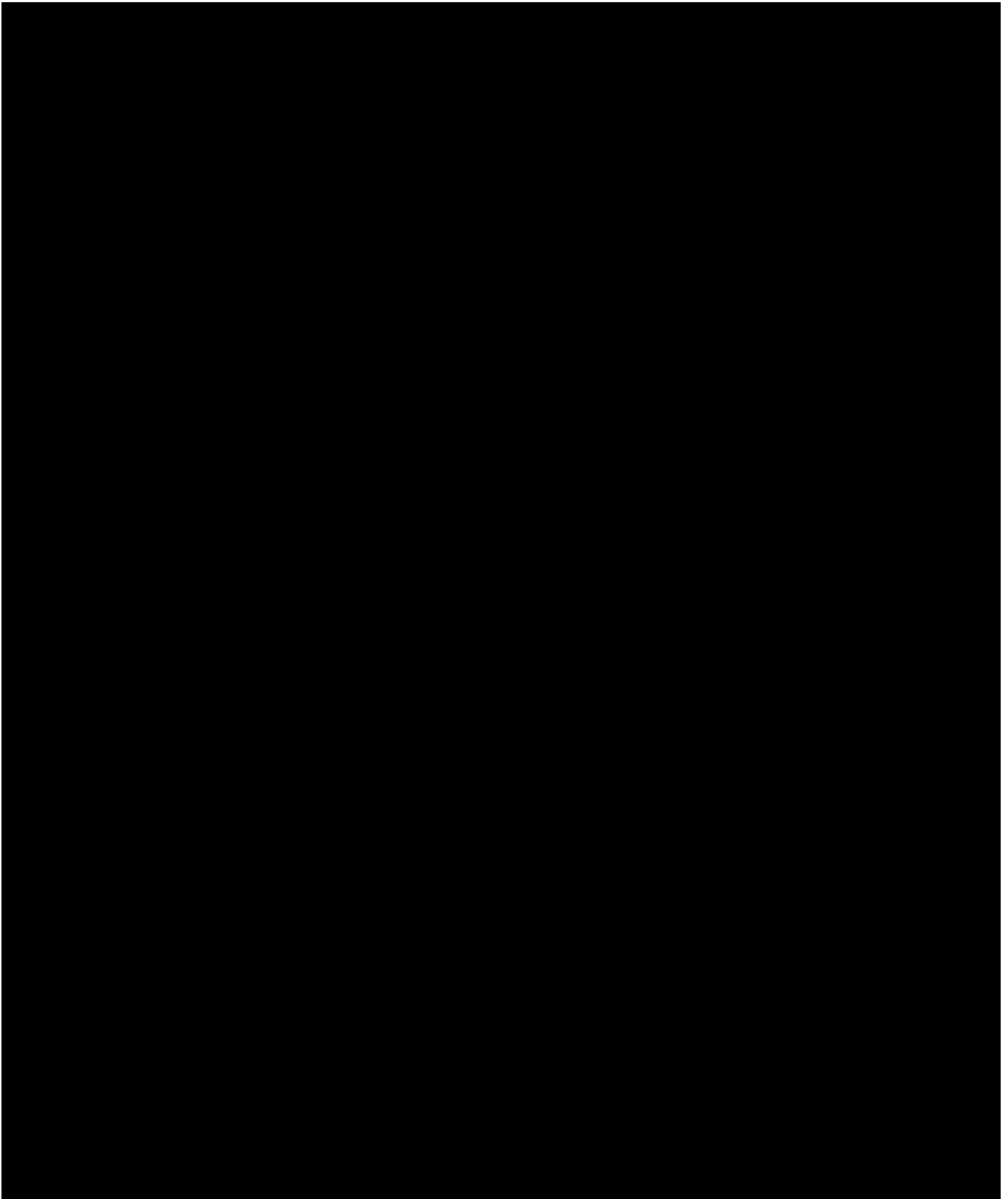
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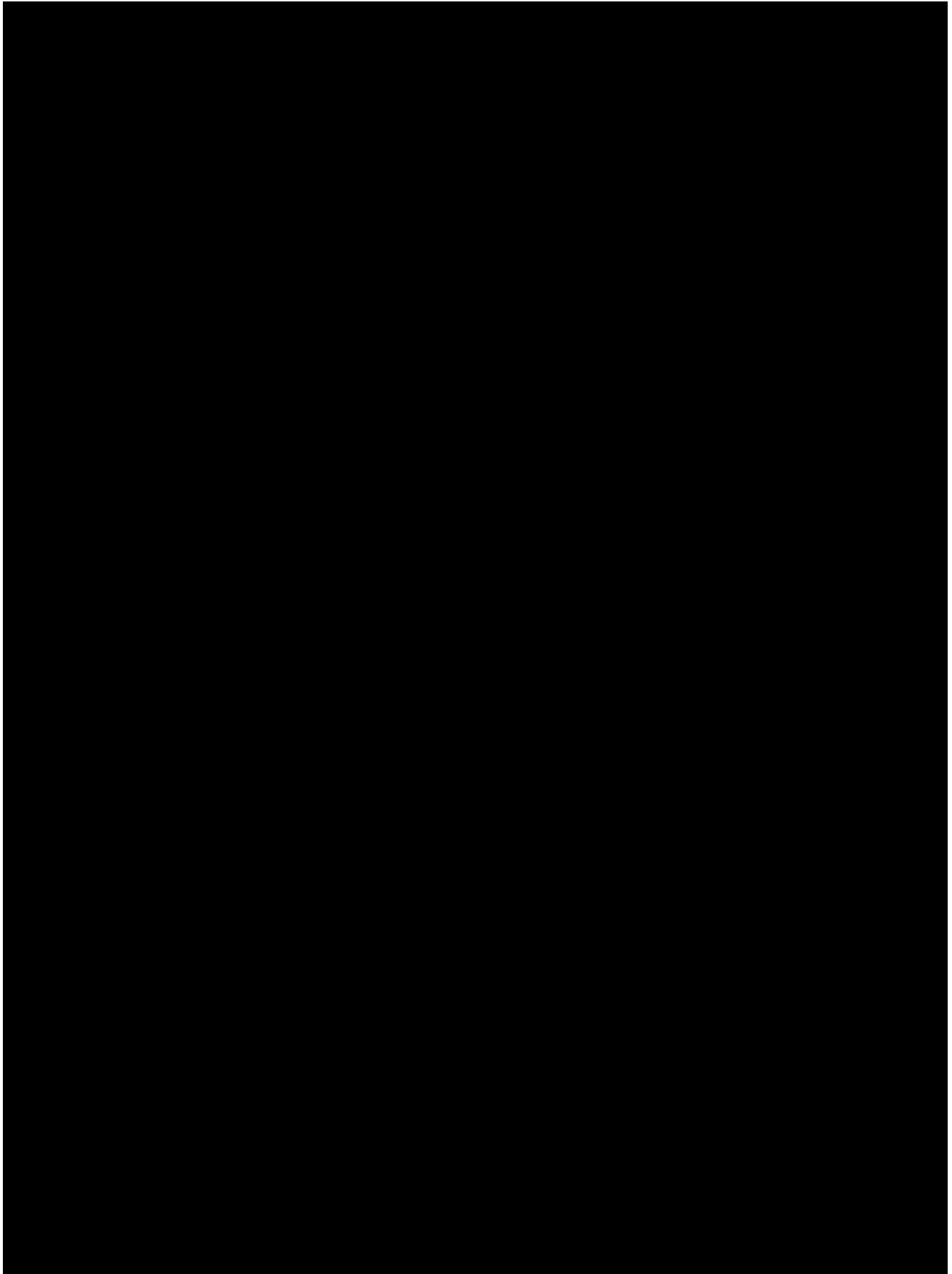


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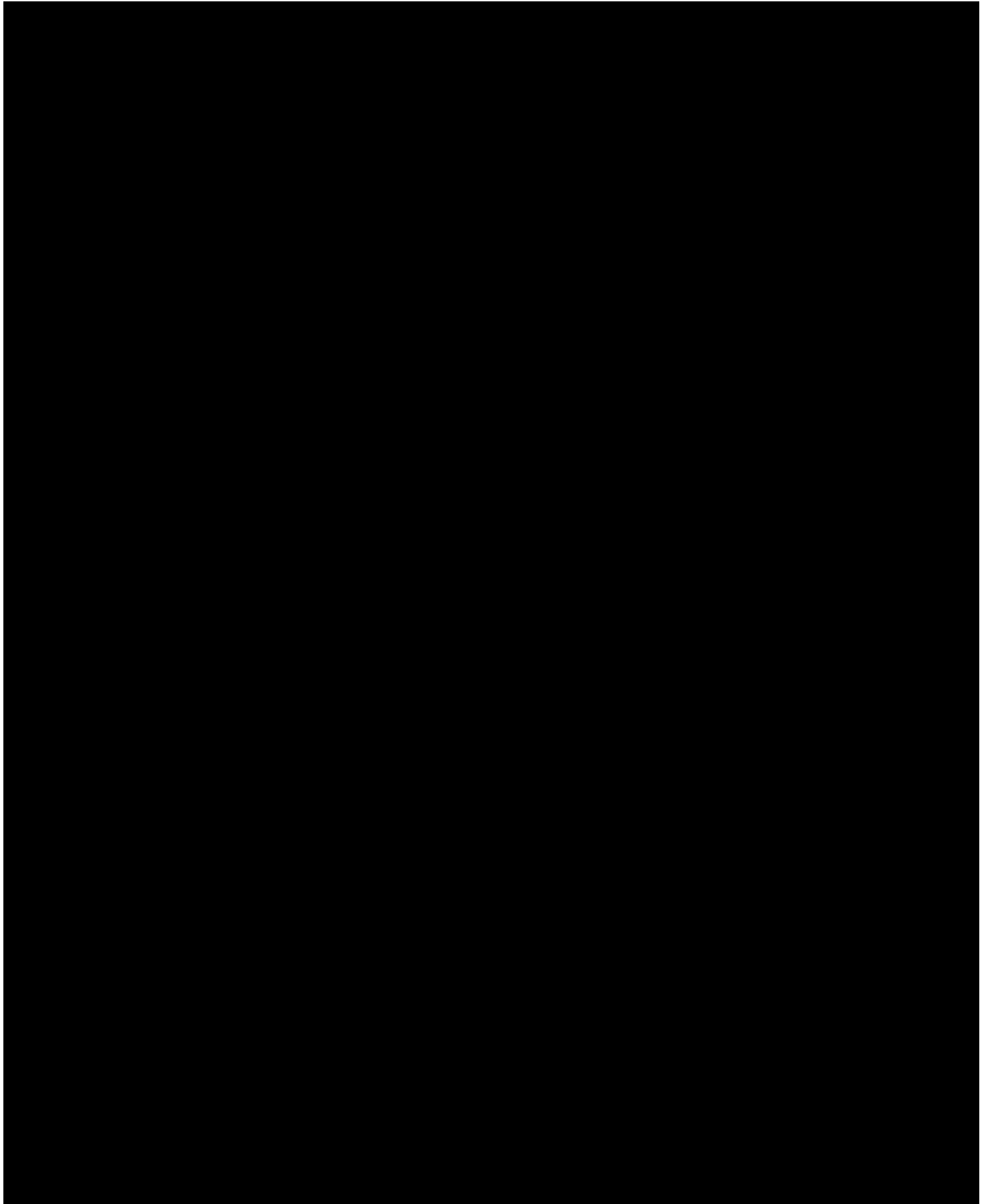




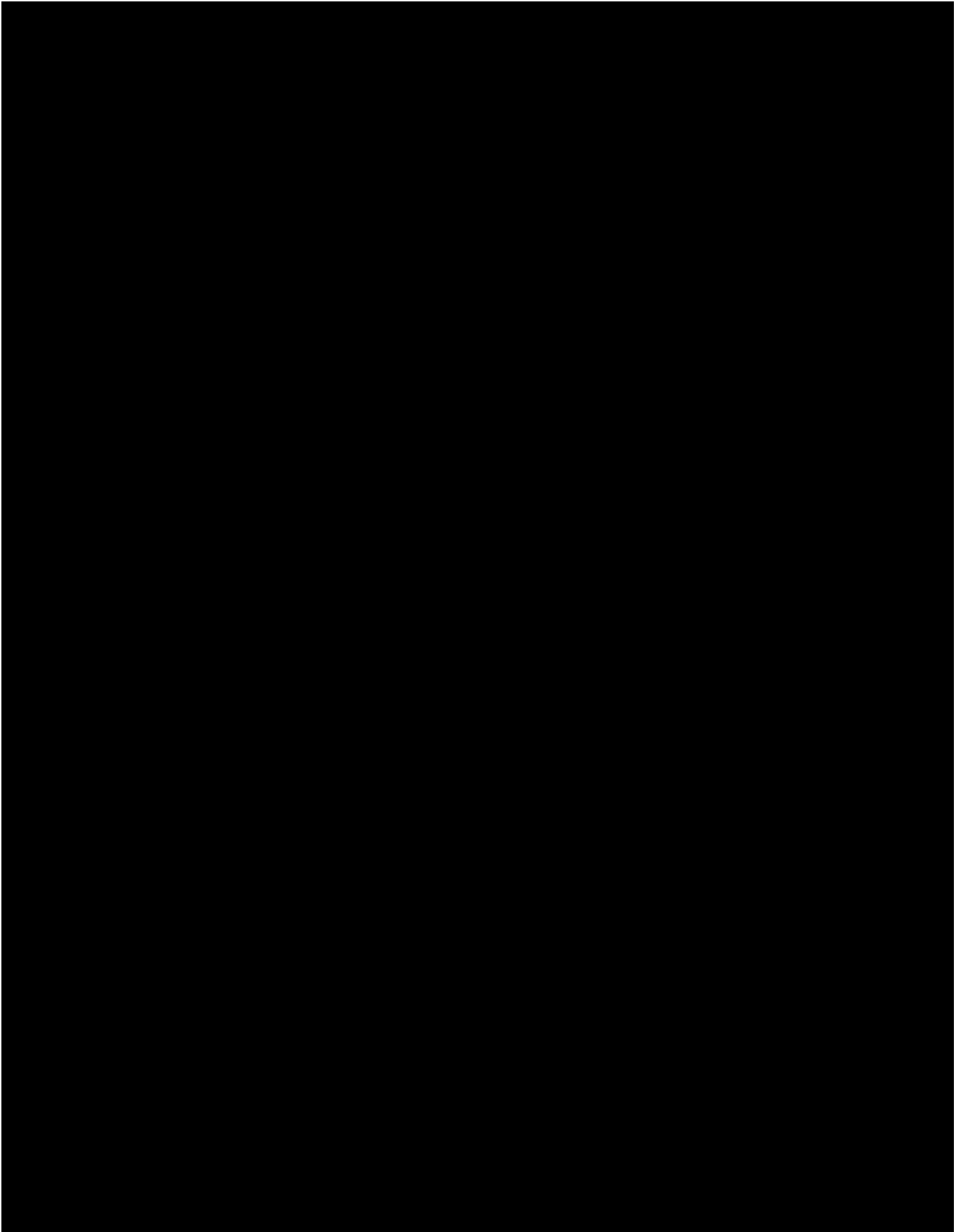
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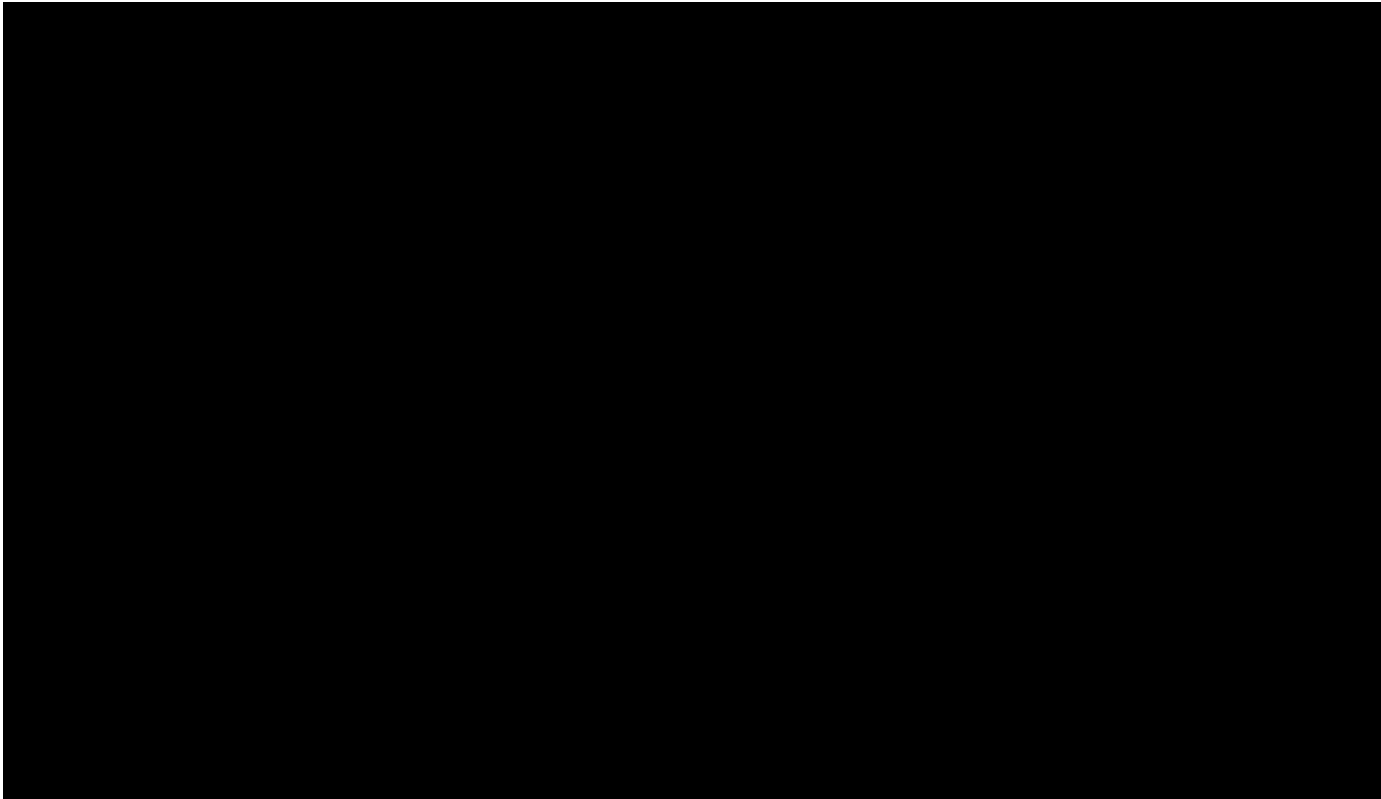
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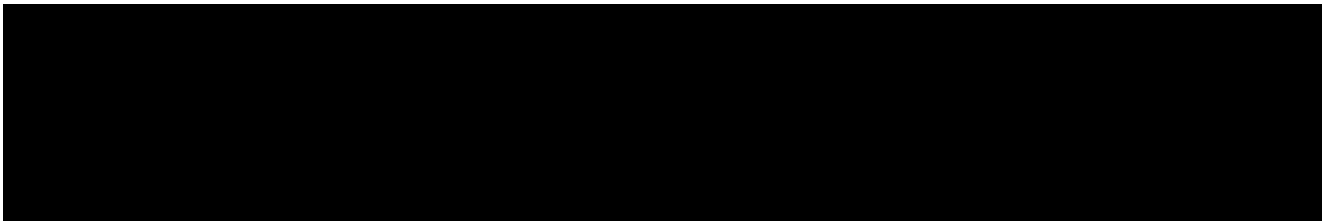
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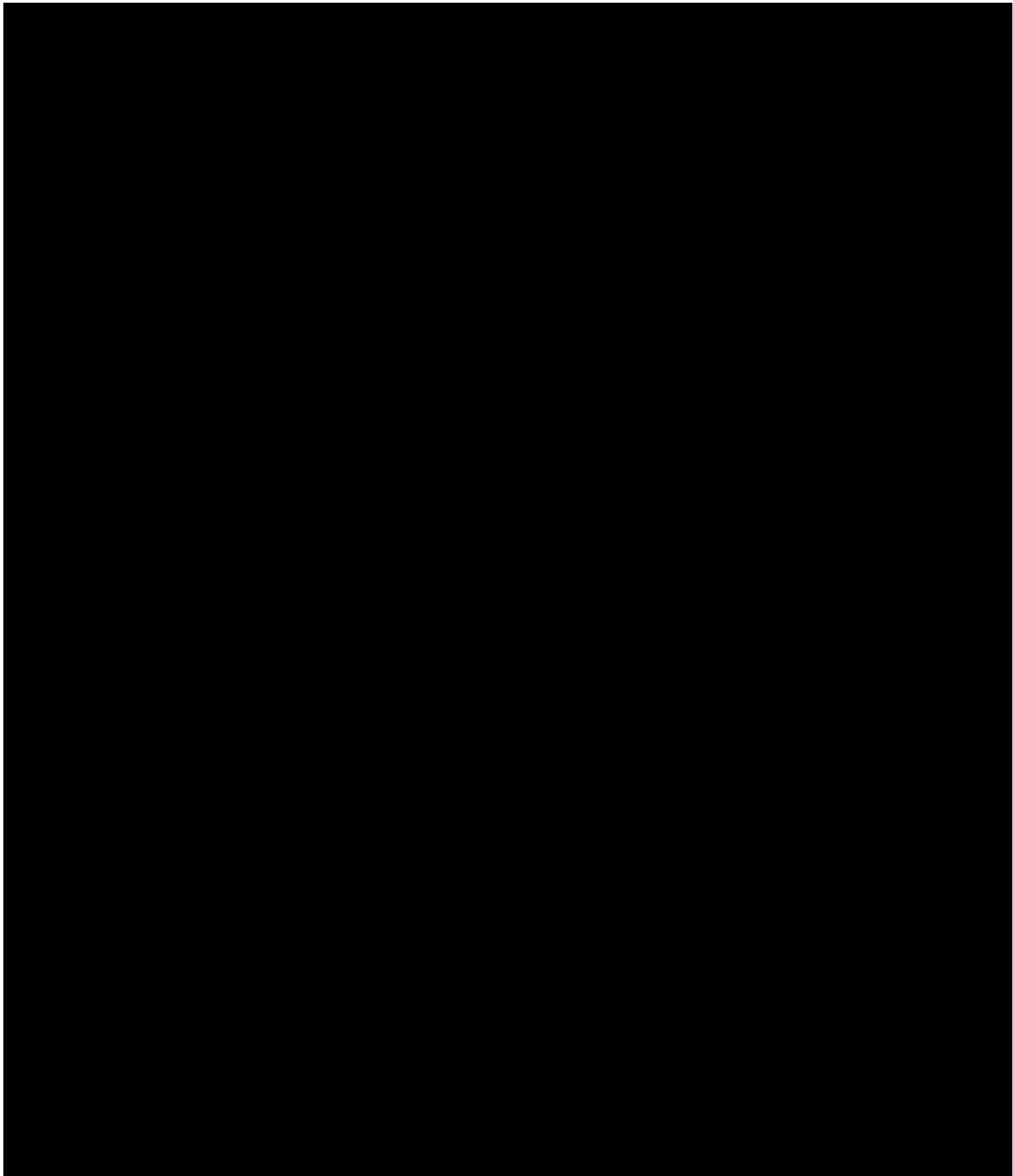
e. Later on April 4, 2018, Uribe messaged Hana, writing, “The deal is to kill and stop all investigation. I am talking to [REDACTED] and he is falling sleep” and then, “If this shit about truckers workers compensation keeps going. How you going to move the containers out of port.” Based on Uribe’s March 28, 2018 message providing Hana with information about [REDACTED] defense lawyer described in paragraph 44, above, the nature of the criminal charges against [REDACTED] (involving workers’ compensation fraud relating to his trucking company), the nature of the suspected bribery scheme, including as outlined by [REDACTED] in the August 2019 conversation with the CS described in paragraph 27, above, and [REDACTED] retention of [REDACTED] as described in paragraph 44, above, I believe that, in these messages, Uribe was referring to the criminal case against [REDACTED] and/or the investigative steps involving [REDACTED]



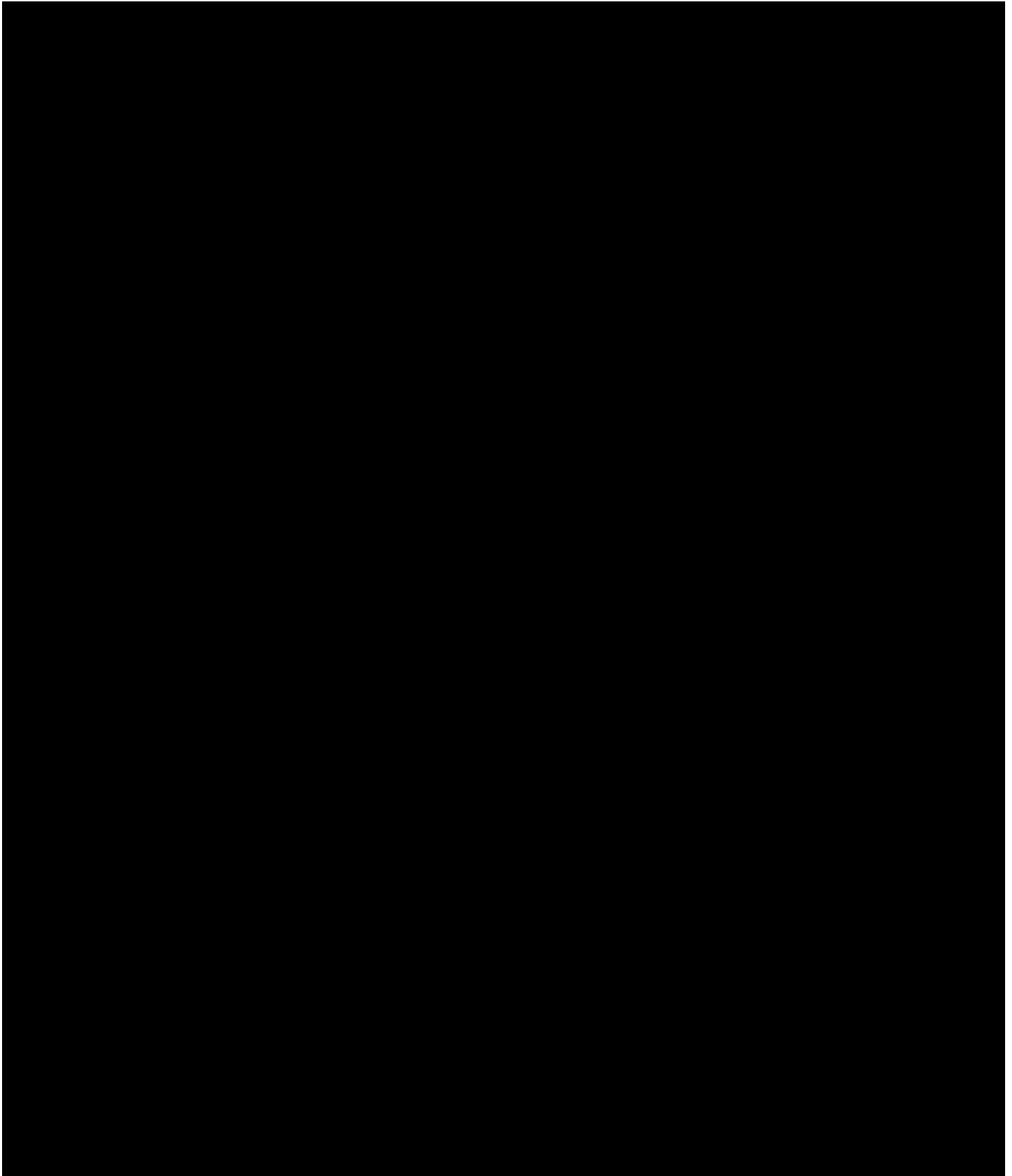
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- i. The contents of the Uribe Email Account-1 Media and the [REDACTED] Email Account Media reveal that both Uribe and [REDACTED] are affiliated with multiple companies related to the trucking industry. Uribe Email Account-1's email address is [REDACTED] among other things, to conduct the business of [REDACTED] a trucking company, notwithstanding that Uribe is not listed on any tax filings as affiliated with the company. The Uribe Email Account-1 Media also contains numerous communications between Uribe and [REDACTED] regarding trucking insurance for which [REDACTED] a company [REDACTED] appears to be employed by, apparently serves as an insurance broker servicing the trucking industry. The contents of the Uribe iCloud Account Media and the Seized Uribe Cellphone show Uribe repeatedly directing [REDACTED] to provide insurance certificates for [REDACTED] to third parties. As set forth below, I believe that Uribe is also affiliated with trucking companies [REDACTED] (see paragraph 59.i) and [REDACTED] (see paragraph 59.d.i).¹⁵

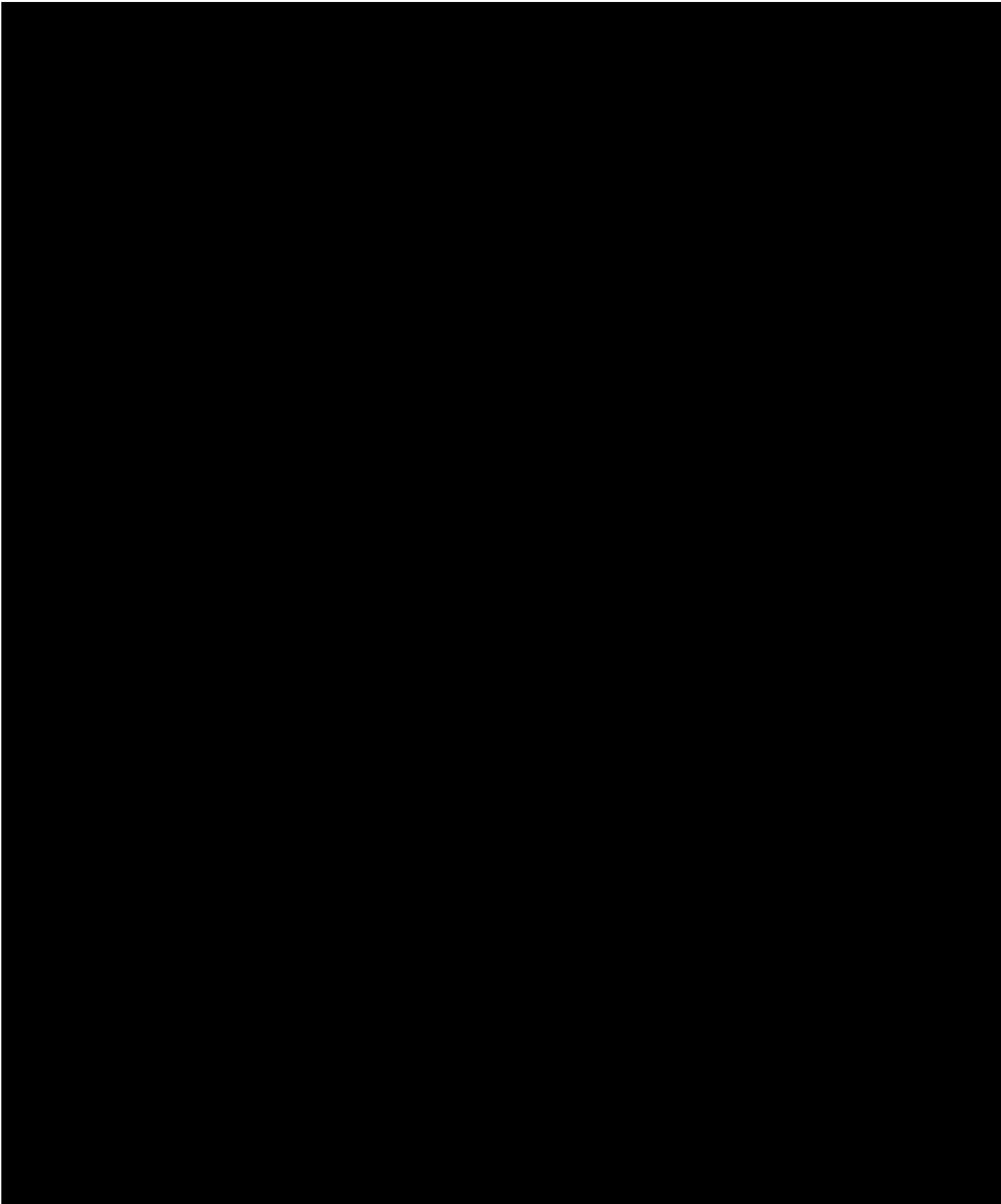
¹⁵ Uribe appears to be affiliated with another company not apparently in the insurance or trucking industry as well. The contents of the Uribe Email Account-1 Media show Uribe sending bank and corporate documents for [REDACTED] to other individuals. The contents of the Uribe iCloud Account Media include a photograph of an insurance card for an Acura automobile where [REDACTED] is listed as the company issuing the card and [REDACTED] is listed as the insured.



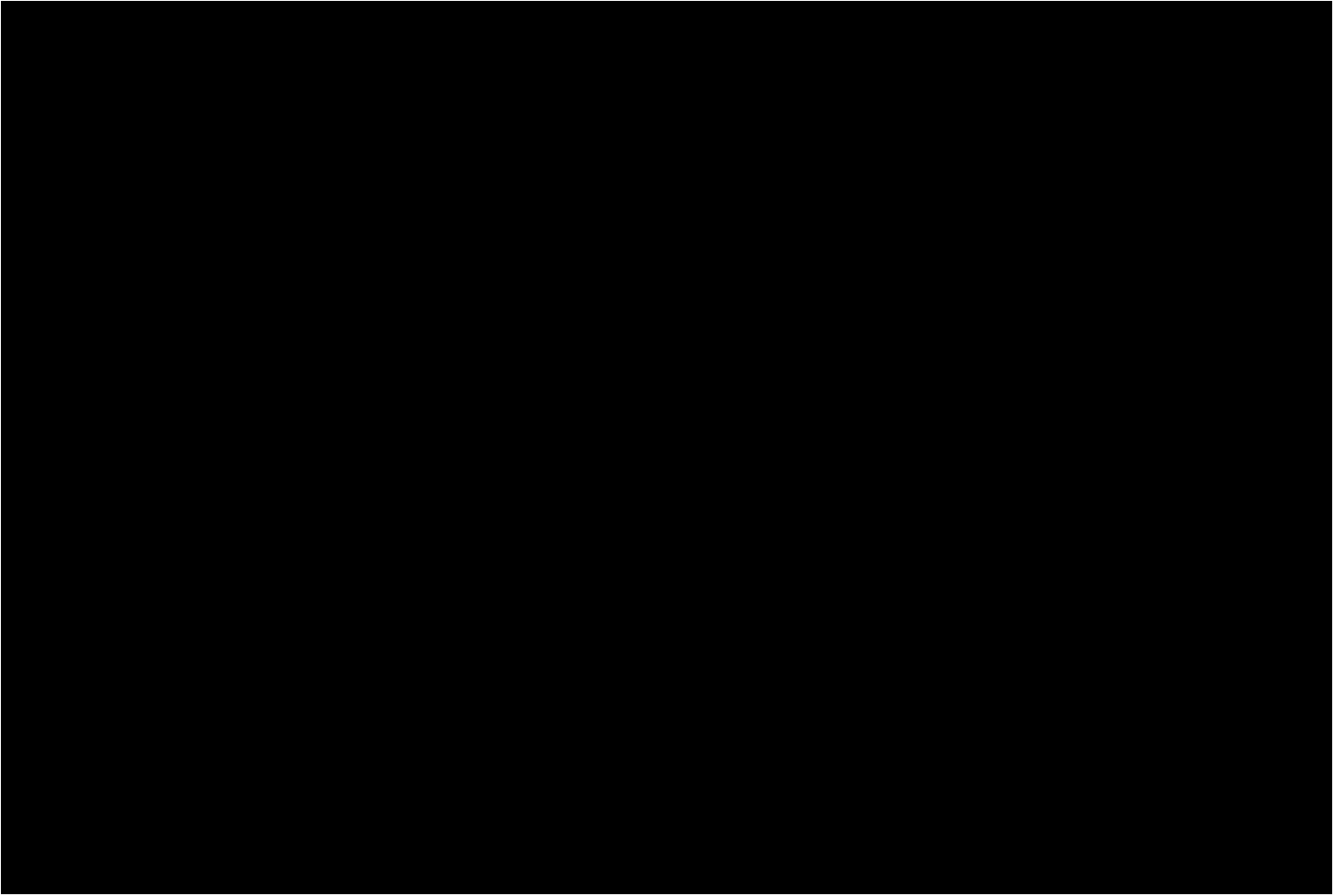
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46. Based on my review of the Seized Uribe Cellphone, the Uribe Email Account-1 Media, documents obtained pursuant to grand jury subpoenas or pursuant to voluntary requests by New Jersey law enforcement bodies, and reports prepared by other law enforcement officers, I have learned that Uribe believed that [REDACTED] was at risk due to her involvement in several forms of activity at [REDACTED]. As noted in paragraph 15, above, Uribe had previously been prosecuted for insurance fraud related to his issuance of fictitious policies at [REDACTED]. As a result of this prosecution—which resulted in his conviction—he lost his insurance broker’s license. [REDACTED] was formed in 2011, at a time period when he was in the late stages of his license revocation procedures, and appears based upon a review of the contents of the Uribe Email Account-1 Media and the Seized Uribe Cellphone to have served as a means for Uribe to

circumvent the loss of his insurance license and continue his business by using nominee insurance brokers (including, during the relevant time period, [REDACTED] to conduct insurance brokerage business on paper while in fact—as demonstrated by numerous text messages and emails found in the Uribe Email Account-1 Media and the Seized Uribe Cellphone—Uribe was in substance running the business, including directing [REDACTED] actions and interacting with customers.²¹

a. Not only did [REDACTED] apparently run [REDACTED] as a nominee for Uribe, certain insurance certificates apparently generated by [REDACTED] contain irregularities suggestive of the issuance of fictitious insurance policies (just as Uribe did through [REDACTED]). At least one of the insurance certificates refers to a policy supposedly issued by [REDACTED] (the “Carrier”). When the Carrier was issued a grand jury subpoena, however, a representative of the Carrier company advised that after performing a diligent search, the Carrier did not locate any records of such an insurance policy. As noted in paragraph 15, above, from reviewing public source information and records from New Jersey prosecuting authorities, I know that Uribe was previously prosecuted and convicted for insurance fraud as a result of collecting insurance premiums from customers for fictitious insurance policies.

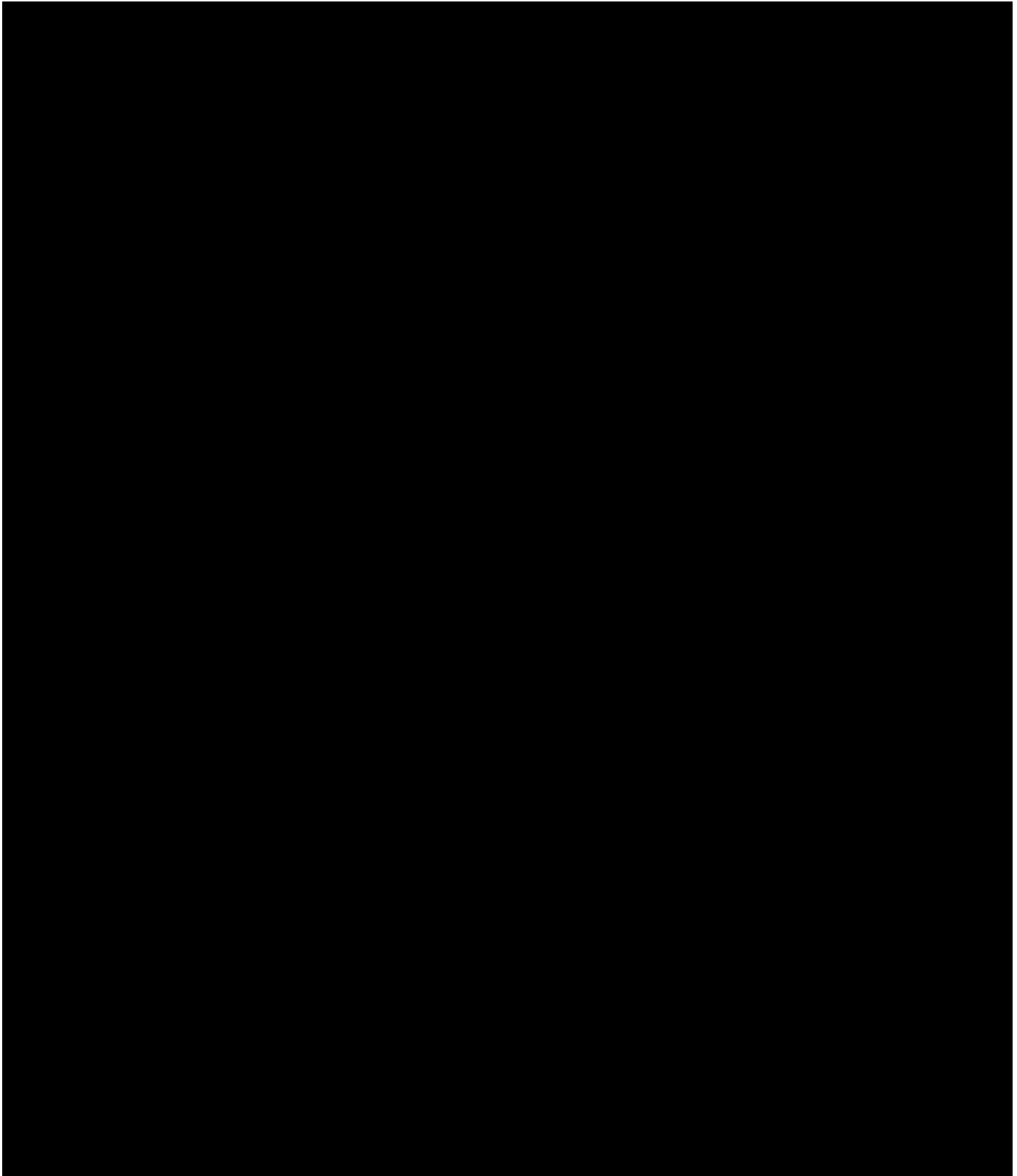
b. Moreover, based on my review of the Uribe Email Account-1 Media, the Seized Uribe Cellphone, documents obtained by grand jury subpoena, and reports of interviews, as well as my conversations with other law enforcement officers, both [REDACTED] and Uribe’s other companies appear to have engaged in a complex practice of diverting payments in order to obscure the source, amount, and purpose of the payments these entities received, as well as to obscure Uribe’s involvement with the companies. For example, payments for one insurance client of

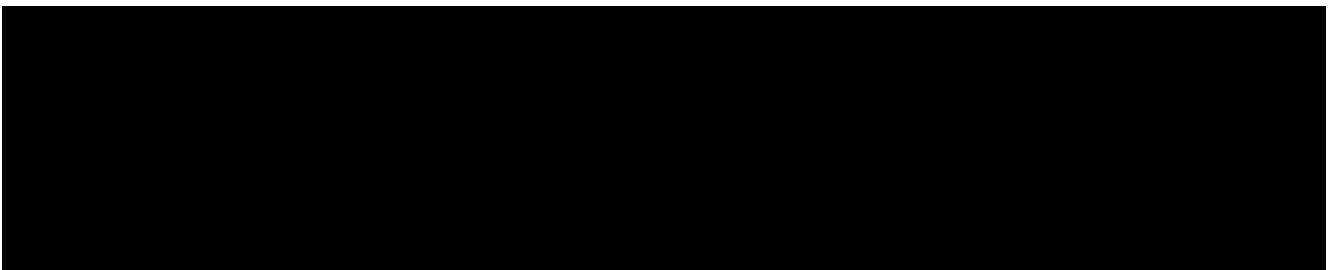
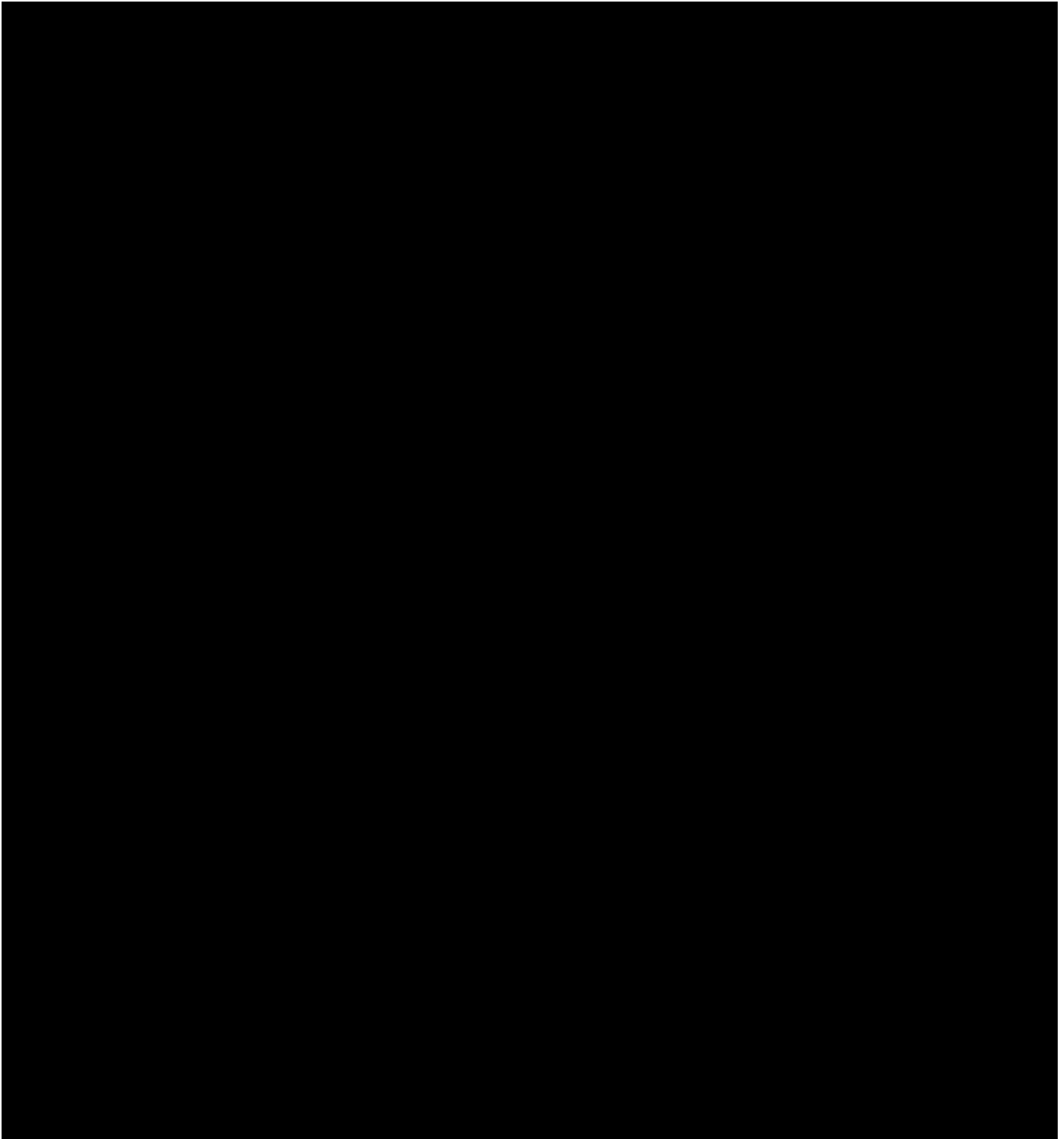
²¹ The name [REDACTED] may be a reference to the use of a new company to carry on the business of the soon-to-be-defunct [REDACTED] given the mythological [REDACTED] ability to be reborn by rising from the ashes of its dead predecessor.

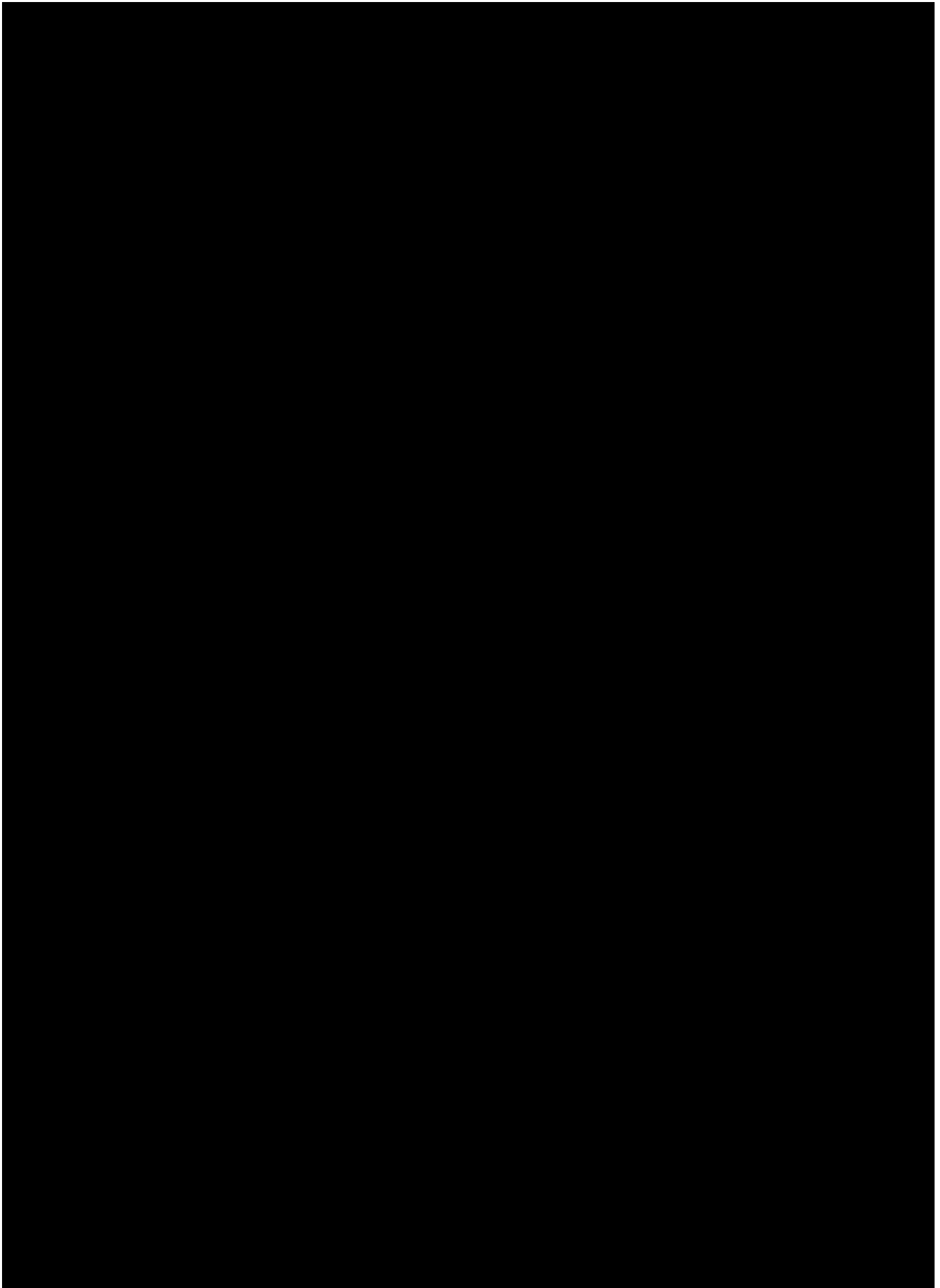
[REDACTED] were instead directed, based on a request that Uribe made through text message, to [REDACTED] a company that was not in Uribe's name but which Uribe in fact controlled. Another [REDACTED] client made its payments for insurance premiums to [REDACTED] a different Uribe-affiliated company. Similarly, Uribe obtained payments from customers who believed they were doing business with him as a representative of [REDACTED] but instead assigned these payments to a factoring company, which factored the invoices (*i.e.*, advanced payment for a percentage of the value of the invoices) and remitted payment in the form of "money codes" that could be written on blank checks in the name of any payee, and in fact used these money codes to direct payments to [REDACTED] another company that—the evidence from the Seized Uribe Cellphone indicates—Uribe controlled and managed.²²

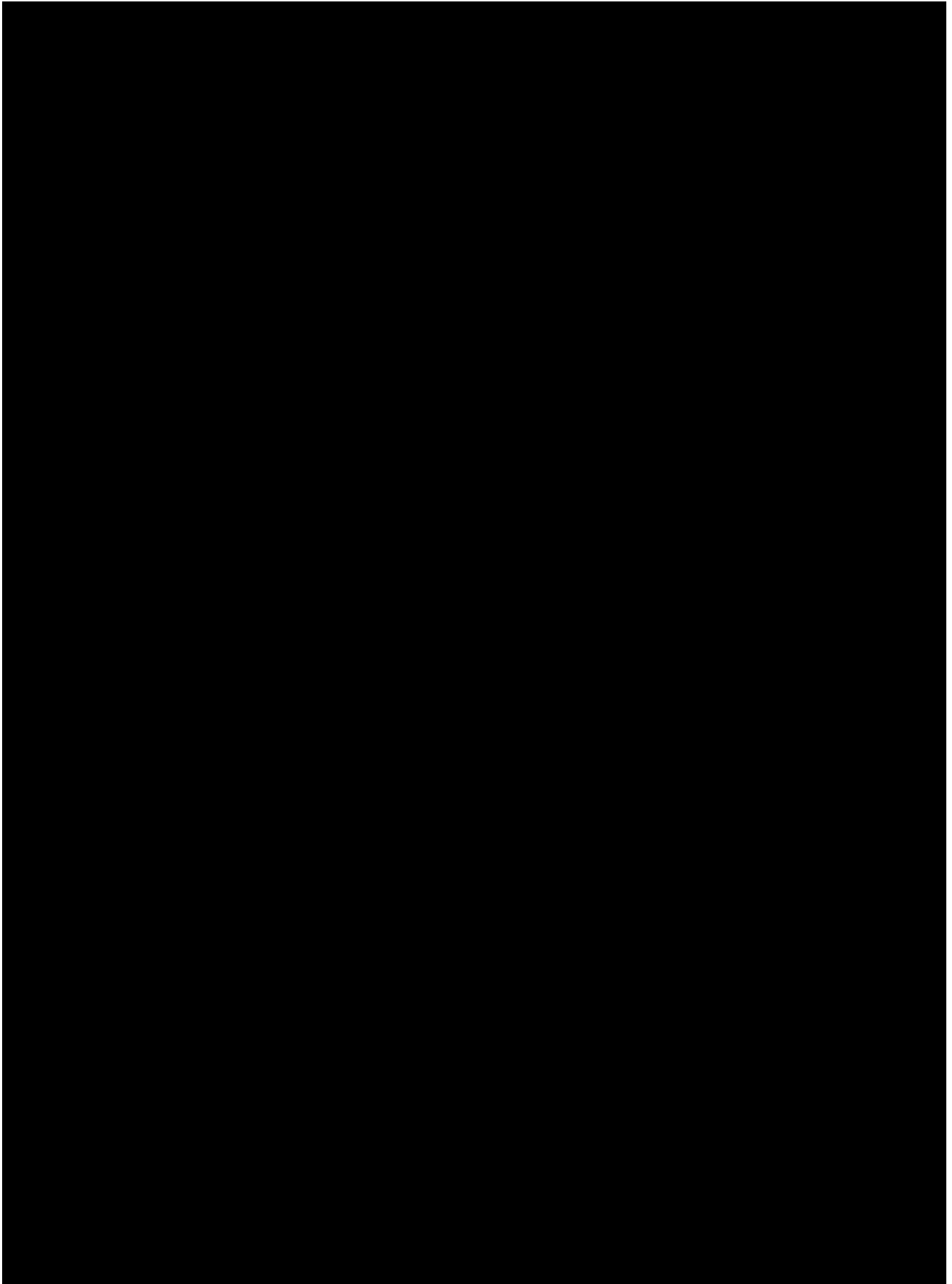
c. From the contents of the Seized Uribe Cellphone, I have learned that Uribe was aware of the risk that [REDACTED] was running as his nominee. For example, in or about August 2020, a relative of Uribe complained to Uribe by text message about being disrespected by [REDACTED] and Uribe responded by text message, writing, "[T]he only reason I have a roof is because she exists. You don't have an idea risk she takes for me. I will appreciate if you do not talk to me About [REDACTED] That's is the end of this conversation."

²² The bank records for the [REDACTED] bank account list Uribe and a relative as cosignors, but the records for the Seized Uribe Cellphone show Uribe regularly directing the relative to perform transactions in the [REDACTED] bank account, as well as to perform routine tasks like open and clean the office.

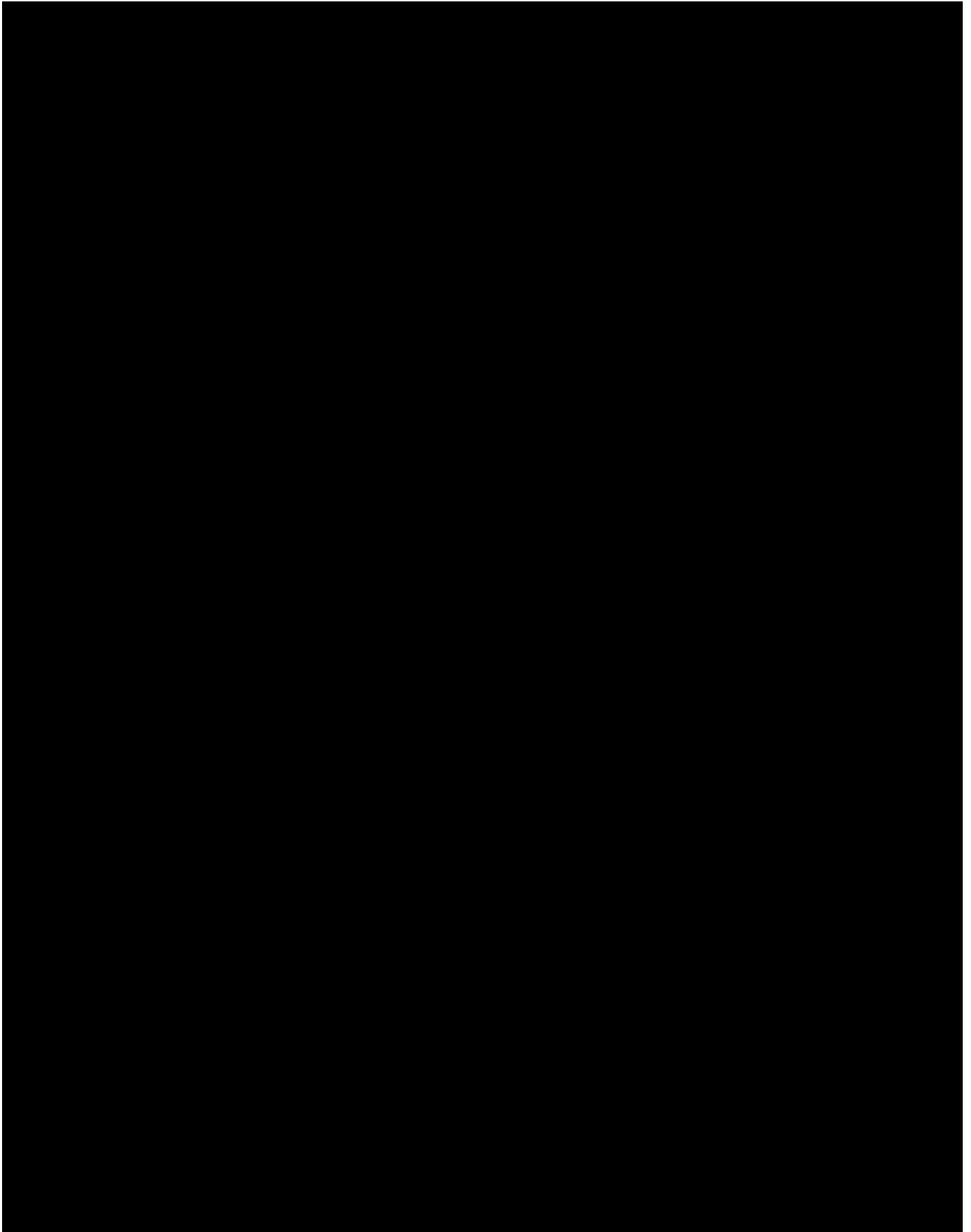




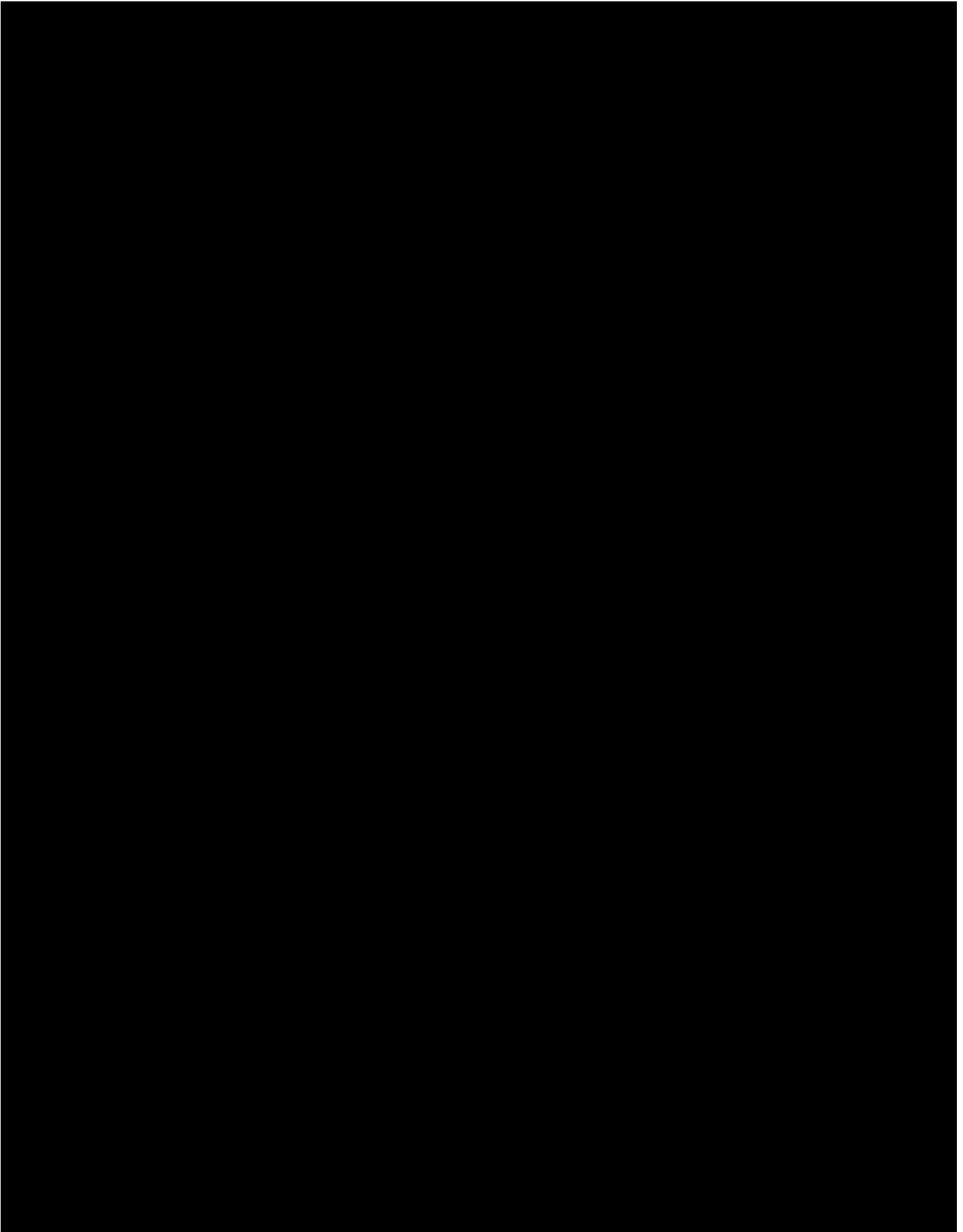


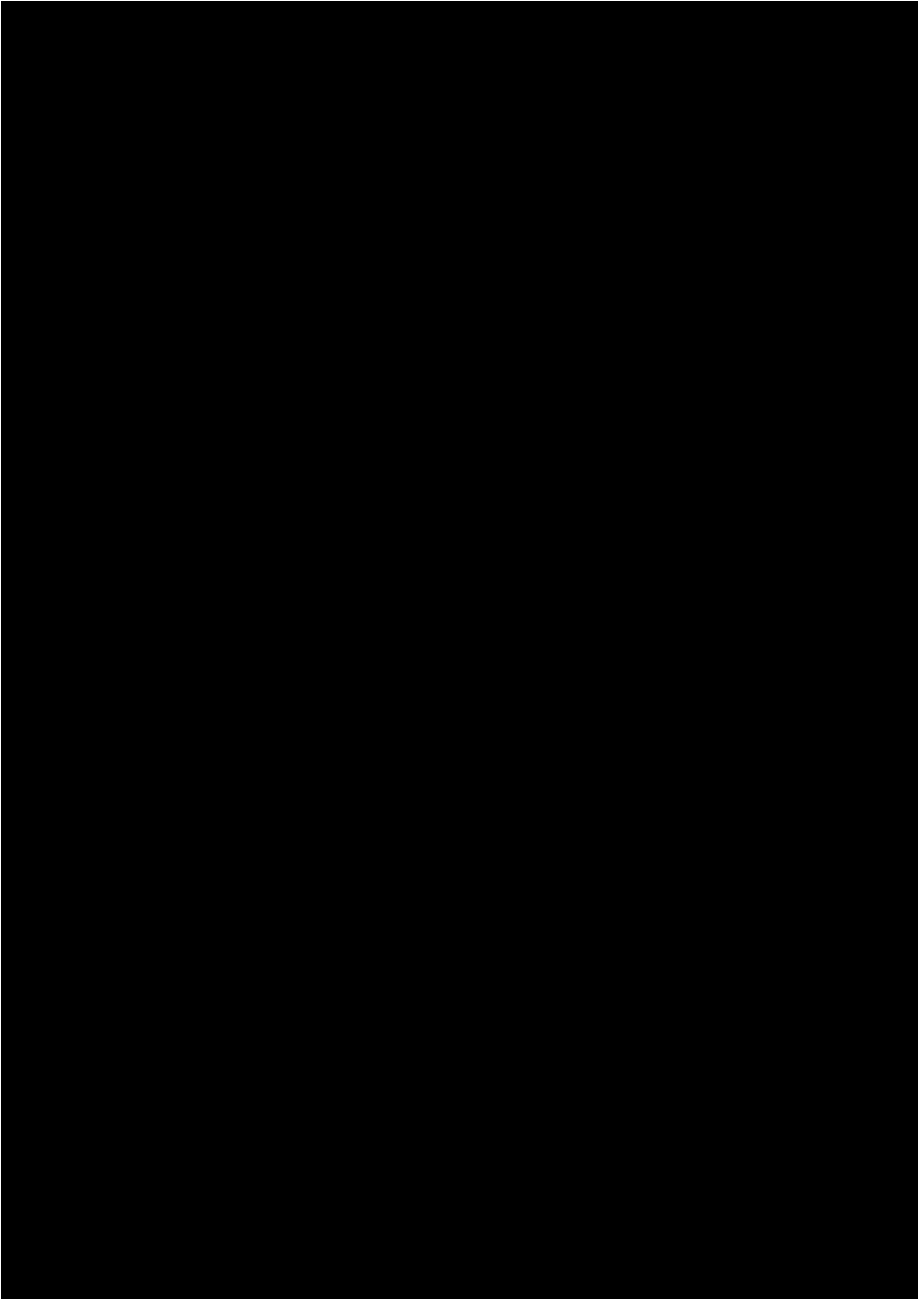


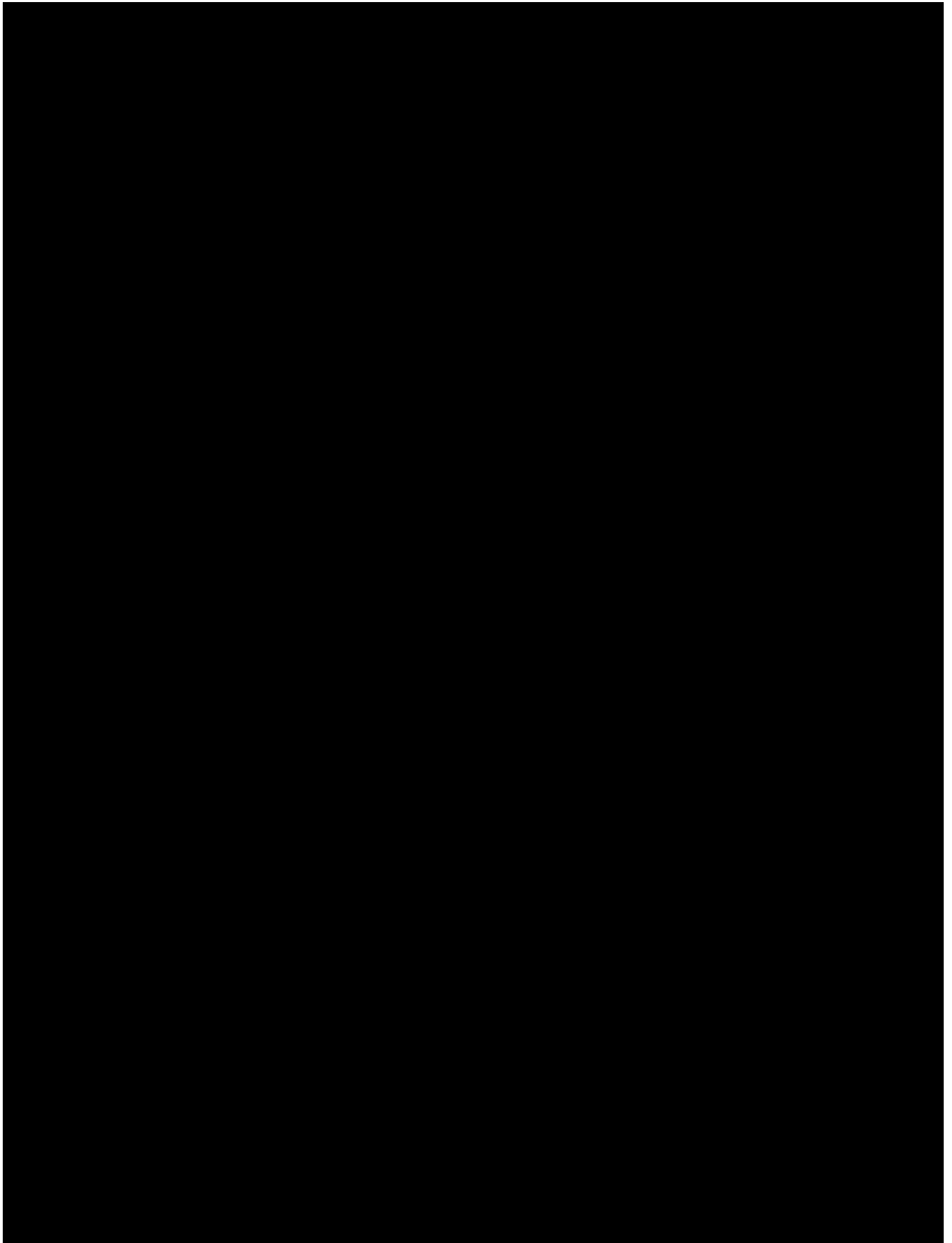
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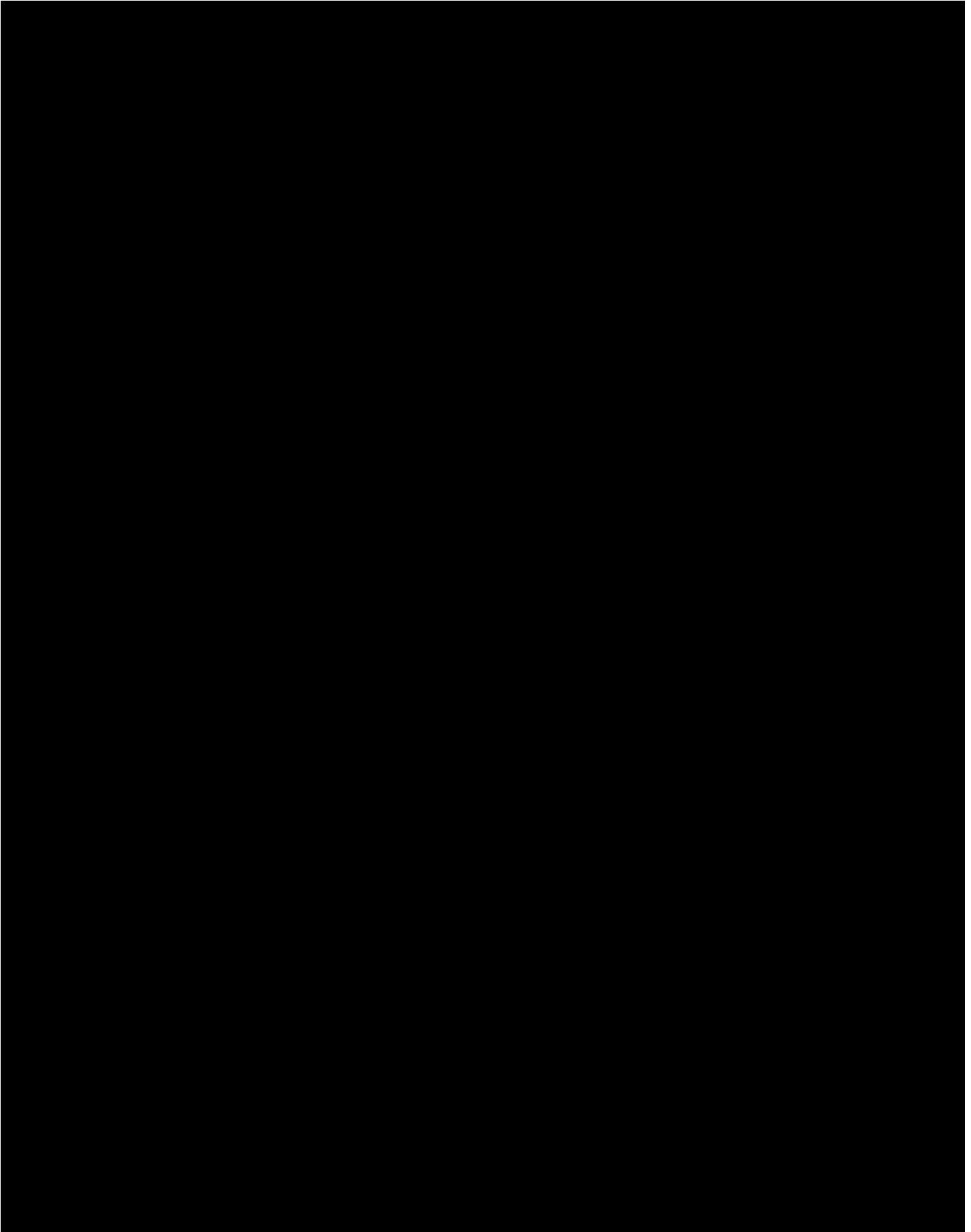
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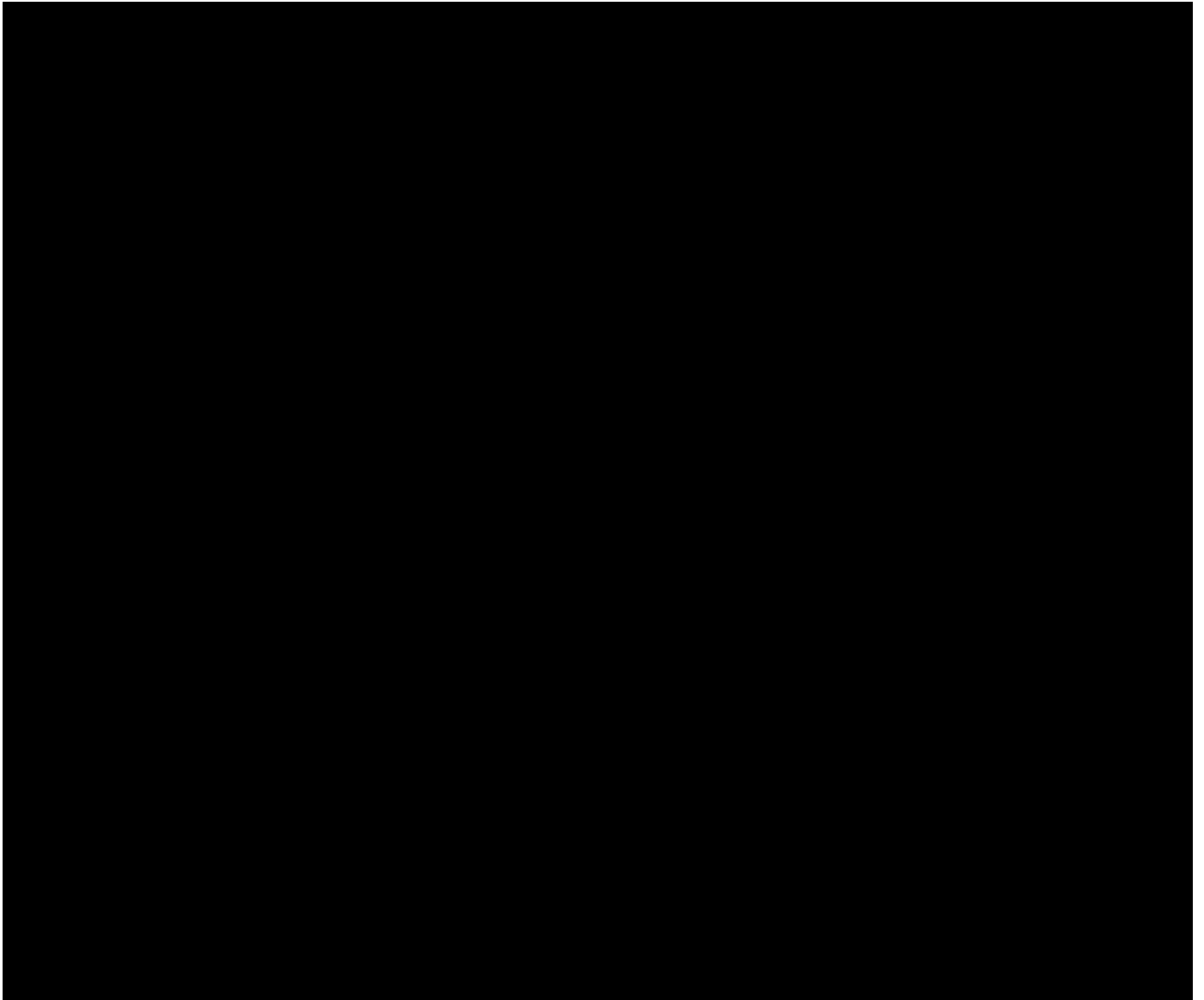




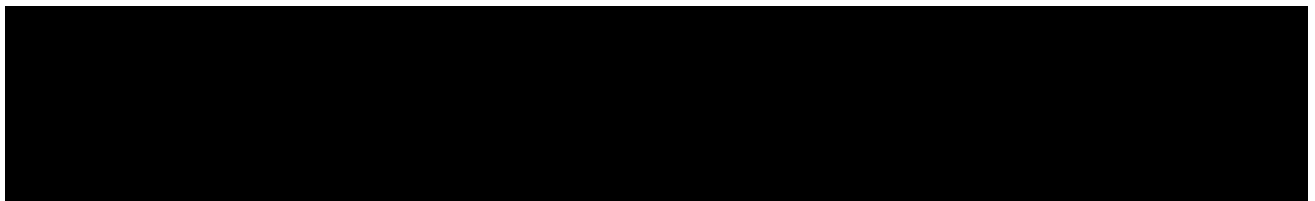
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50. From my conversations with other law enforcement personnel and review of a law enforcement report, I know that on or about June 22, 2022, [REDACTED] spoke to law enforcement personnel and prosecutors, and stated, among other things, in substance and in part:



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a. Prior to the COVID-19 pandemic, Menendez called the [REDACTED] Cellphone and asked [REDACTED] to meet Menendez in Menendez's office in Newark, New Jersey, to which [REDACTED] agreed.

b. During this meeting, which [REDACTED] attended with a senior staffer from the [REDACTED] Menendez claimed that a constituent of his was being prosecuted by New Jersey authorities for insurance fraud in what Menendez claimed was an allegedly selective prosecution.⁴³

c. Menendez stated that this constituent's defense attorney was [REDACTED]. Based on my participation in the investigation and the interview with [REDACTED] as well as my review of the materials cited above indicating that [REDACTED] was represented by [REDACTED] I believe the constituent Menendez claimed was being selectively prosecuted by New Jersey authorities was [REDACTED].

d. [REDACTED] thought it was highly inappropriate for Menendez to talk to him about a criminal case brought by his office, and [REDACTED] did not communicate with the prosecution team regarding [REDACTED] prosecution.⁴⁴

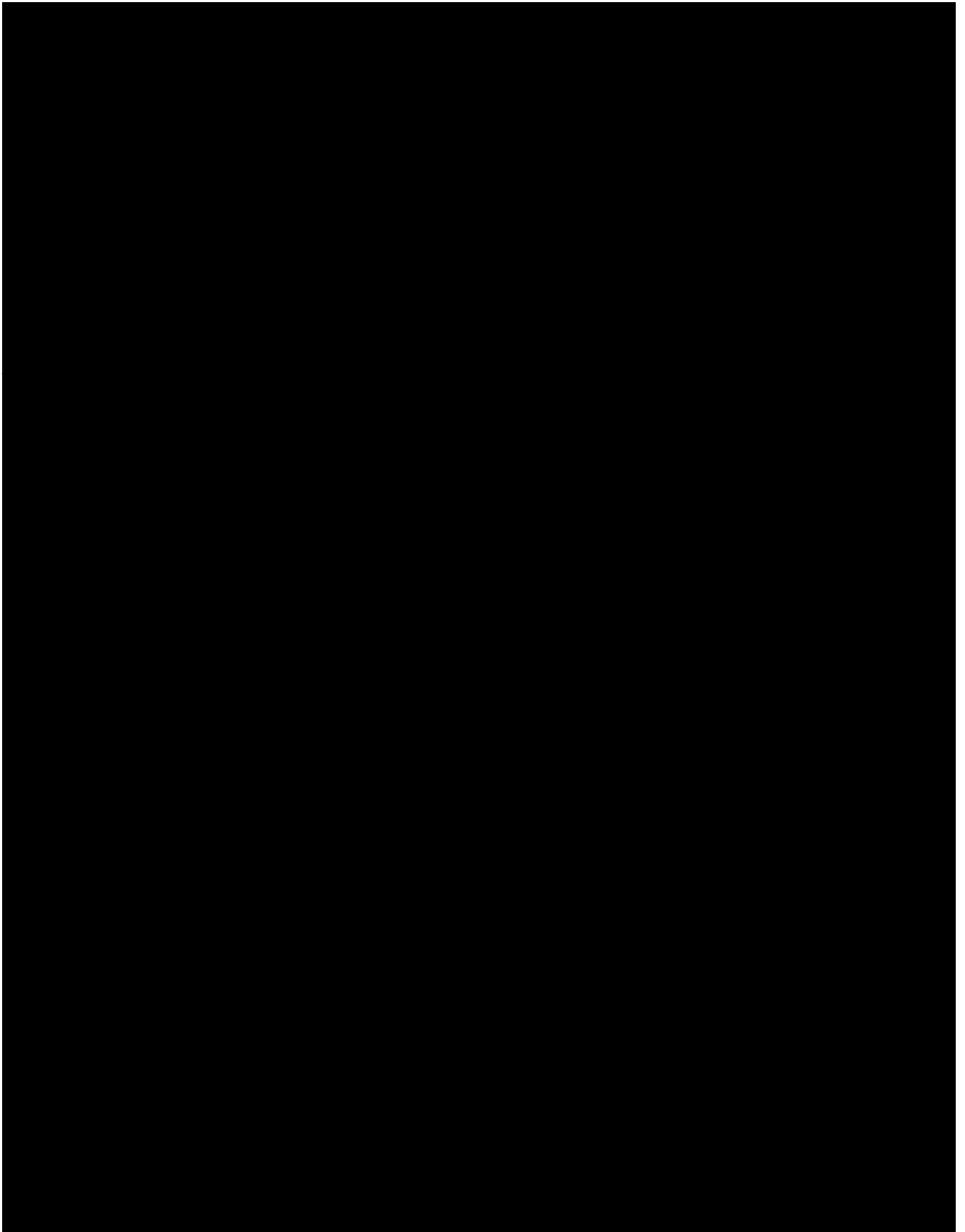
⁴³ I am aware based on my conversations with other law enforcement personnel that representatives of the [REDACTED] were unable to locate any calendar entries for [REDACTED] reflecting a meeting with Menendez in early 2019. However, as noted in paragraph 58.m.i, below [REDACTED] calendar reflects a meeting with Menendez on September 6, 2019—*i.e.*, after the resolution of [REDACTED] criminal prosecution but several weeks after the request for an interview of [REDACTED] in connection with an ongoing criminal investigation described in paragraph 58.a, below.

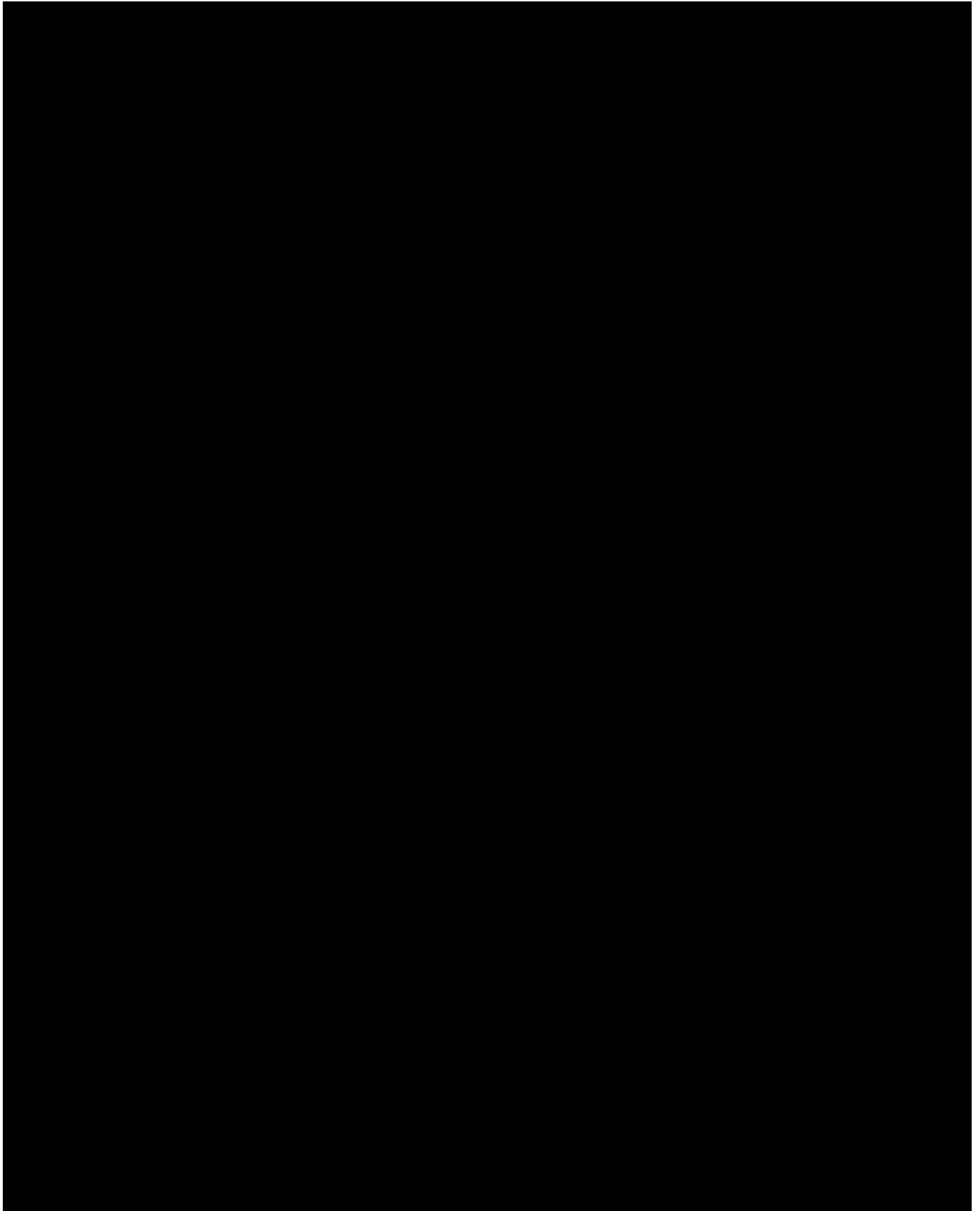
⁴⁴ Based on my discussions with other law enforcement personnel and my review of interview notes, I have learned that on June 30, 2022, the [REDACTED] was interviewed by the FBI, and stated that he remembered that at the meeting, in addition to raising two policy matters, Menendez asked [REDACTED] to "look into" a criminal case in which the defendant was represented by [REDACTED]. The [REDACTED] felt this request was unseemly.

[REDACTED]

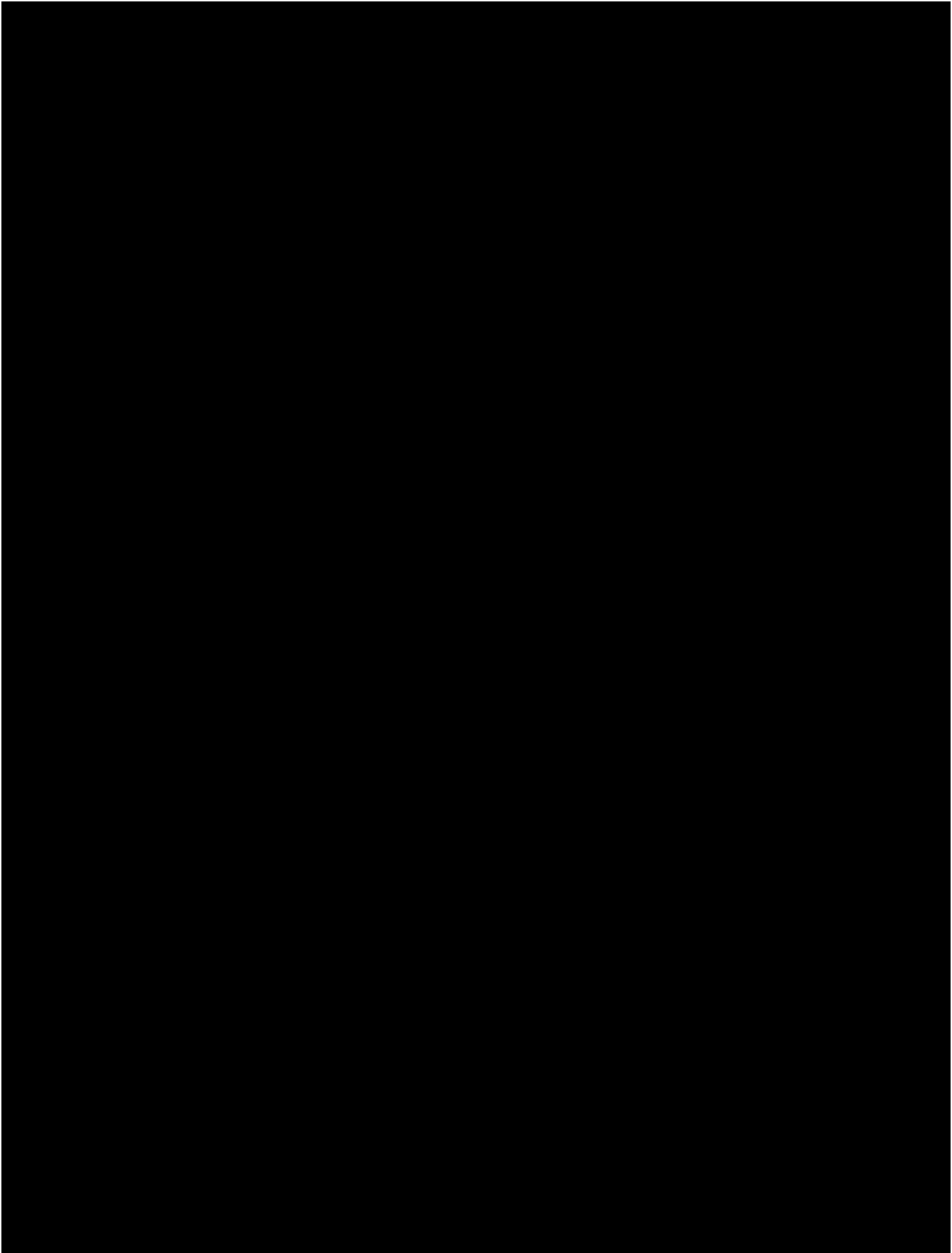
51. As set forth below, I understand that following the January 29, 2019 call from Menendez to [REDACTED] described in paragraph 49.o, above [REDACTED] pled guilty in New Jersey state court to a plea agreement recommending a non-incarceratory sentence and was ultimately sentenced to no jail time, and Arslanian received a series of things of value, including carpeting services by [REDACTED] the Mercedes-Benz Automobile, direct payments to a company she created, and payments to her mortgage company to reinstate her home mortgage.

[REDACTED]

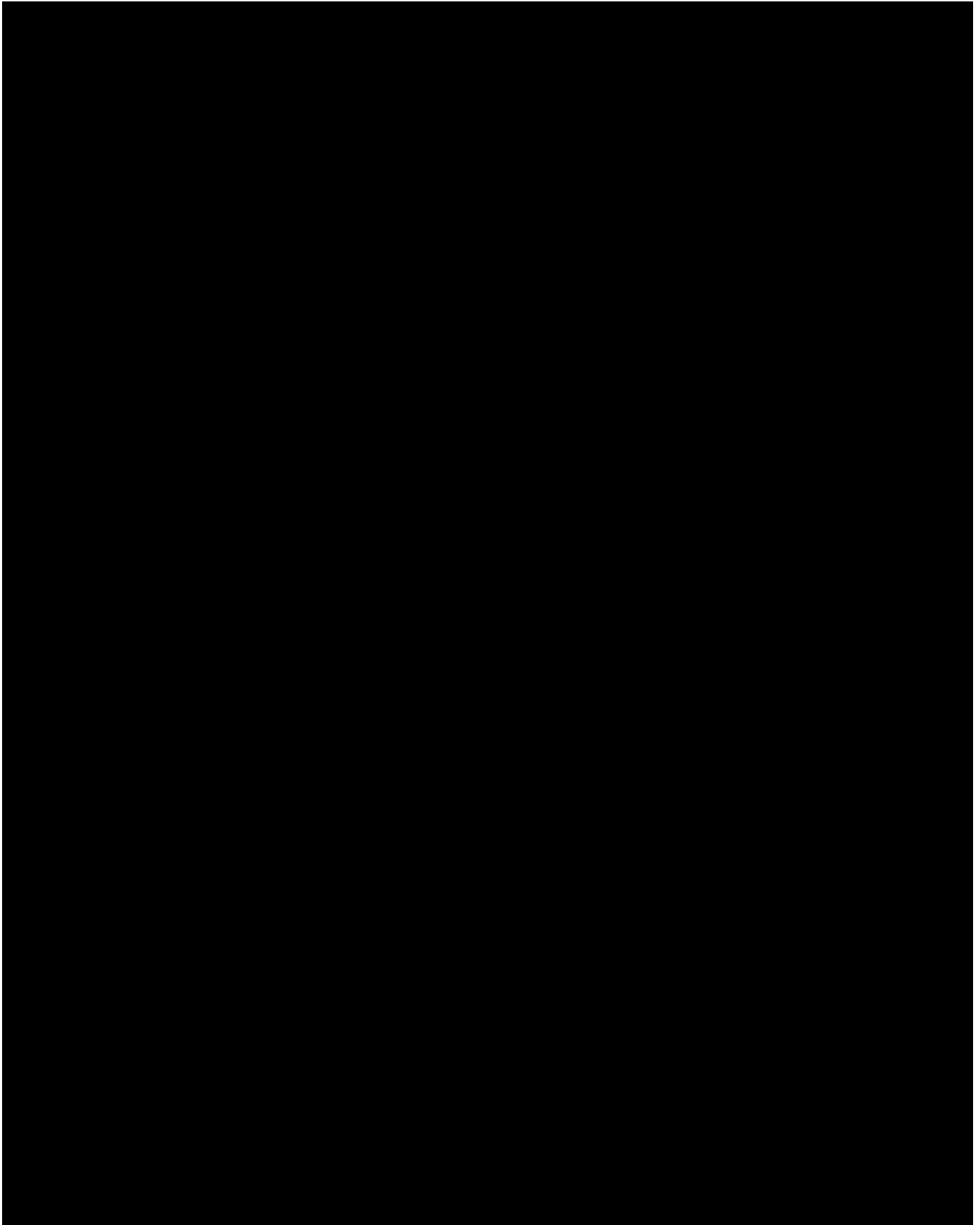


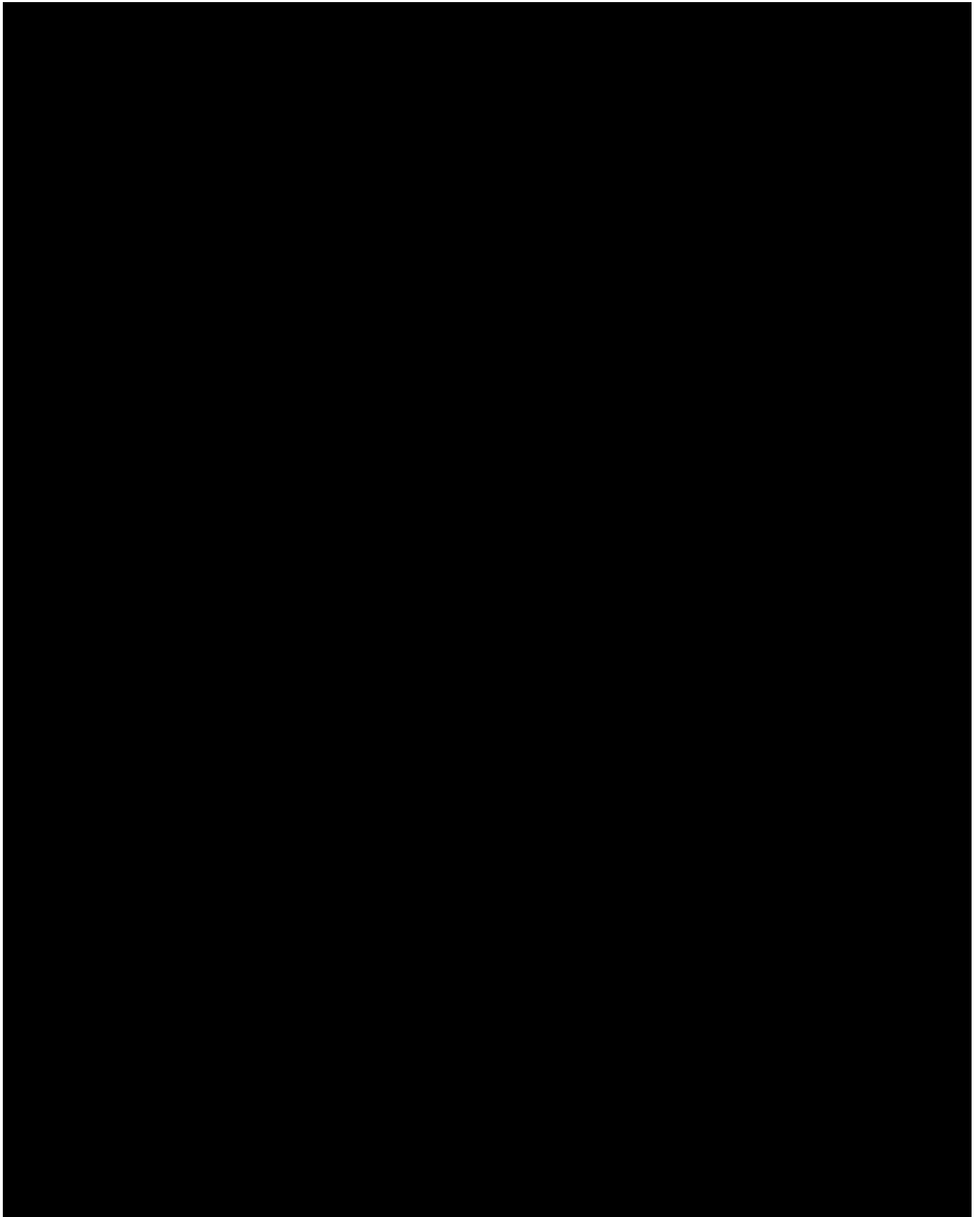


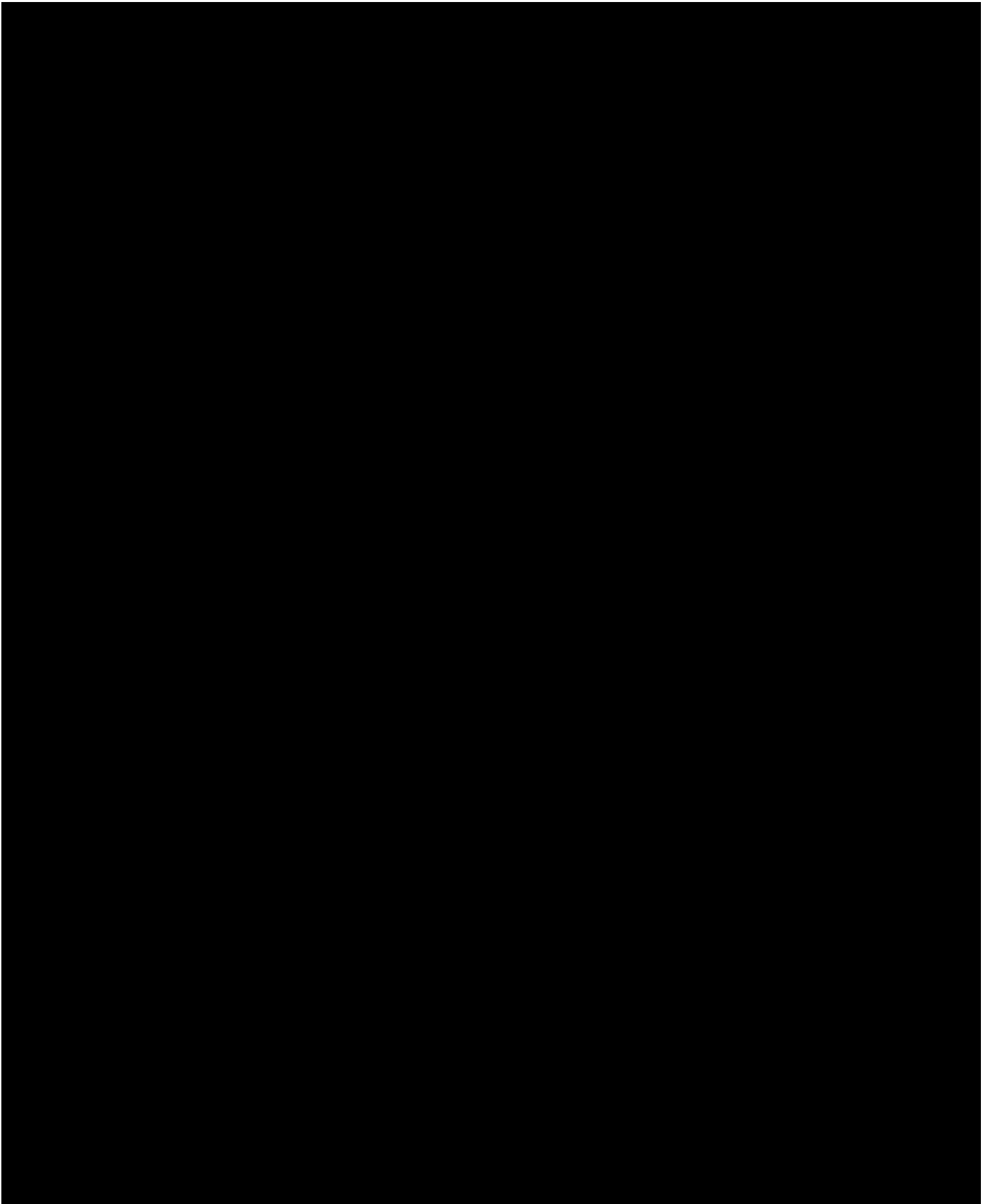
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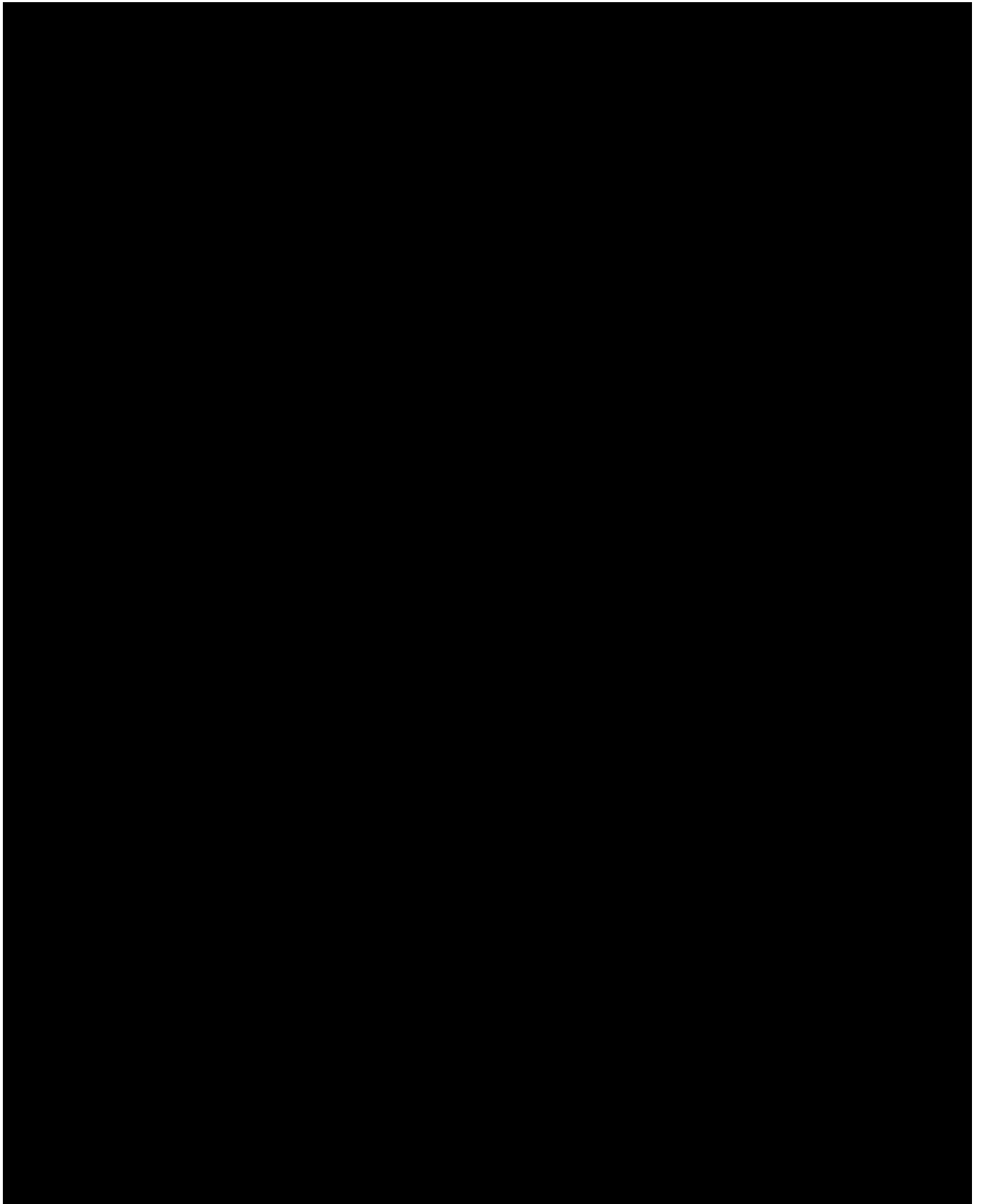
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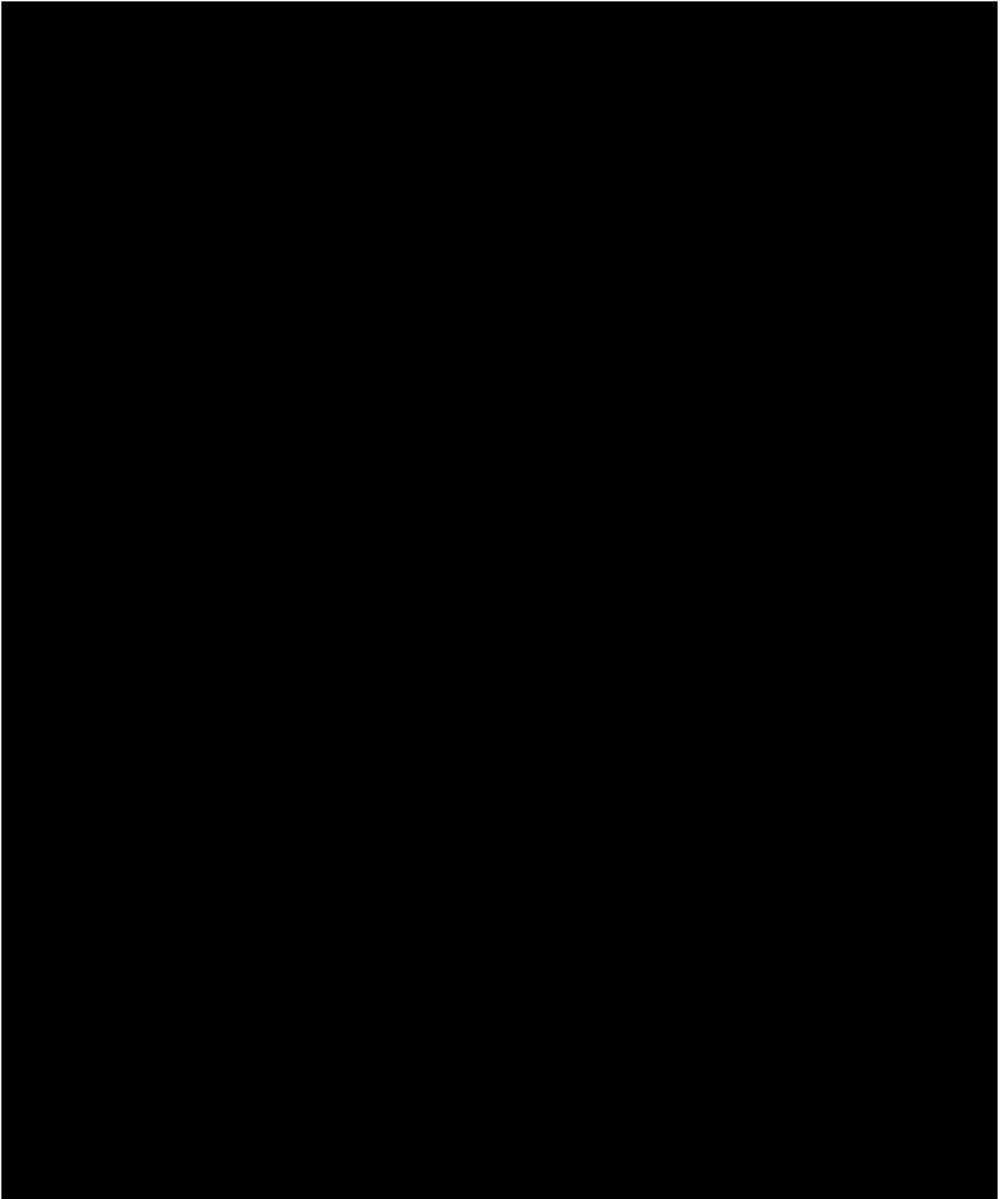
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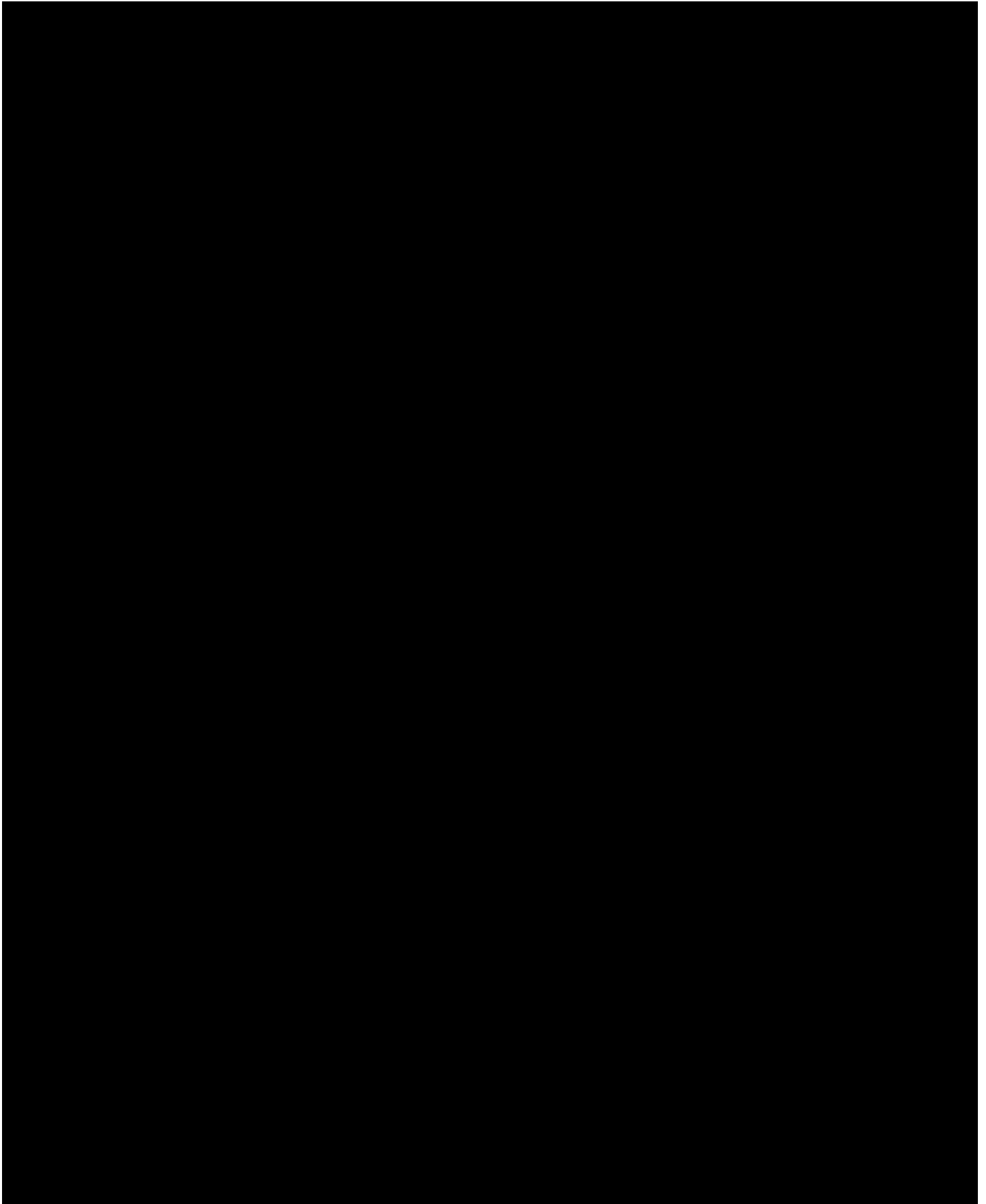
[REDACTED]

x. On May 1, 2019—*i.e.*, two days after [REDACTED] guilty plea—Uribe texted Arslanian, in part, “please send me the invoice.” Later that day, Arslanian texted Uribe a photograph of the first monthly invoice for the automotive loan on the Mercedes-Benz Automobile (the “Arslanian Invoice Photo”). Arslanian texted Uribe, “By Saturday can I pick up the info on part two unless you want to text it to me.” Later that day, Uribe wrote, “I send you later”. I believe based on the context and my participation in the investigation that “part two” refers to the investigation of [REDACTED] with the prosecution of [REDACTED] about which Menendez had already spoken to [REDACTED] representing part one.⁵⁶

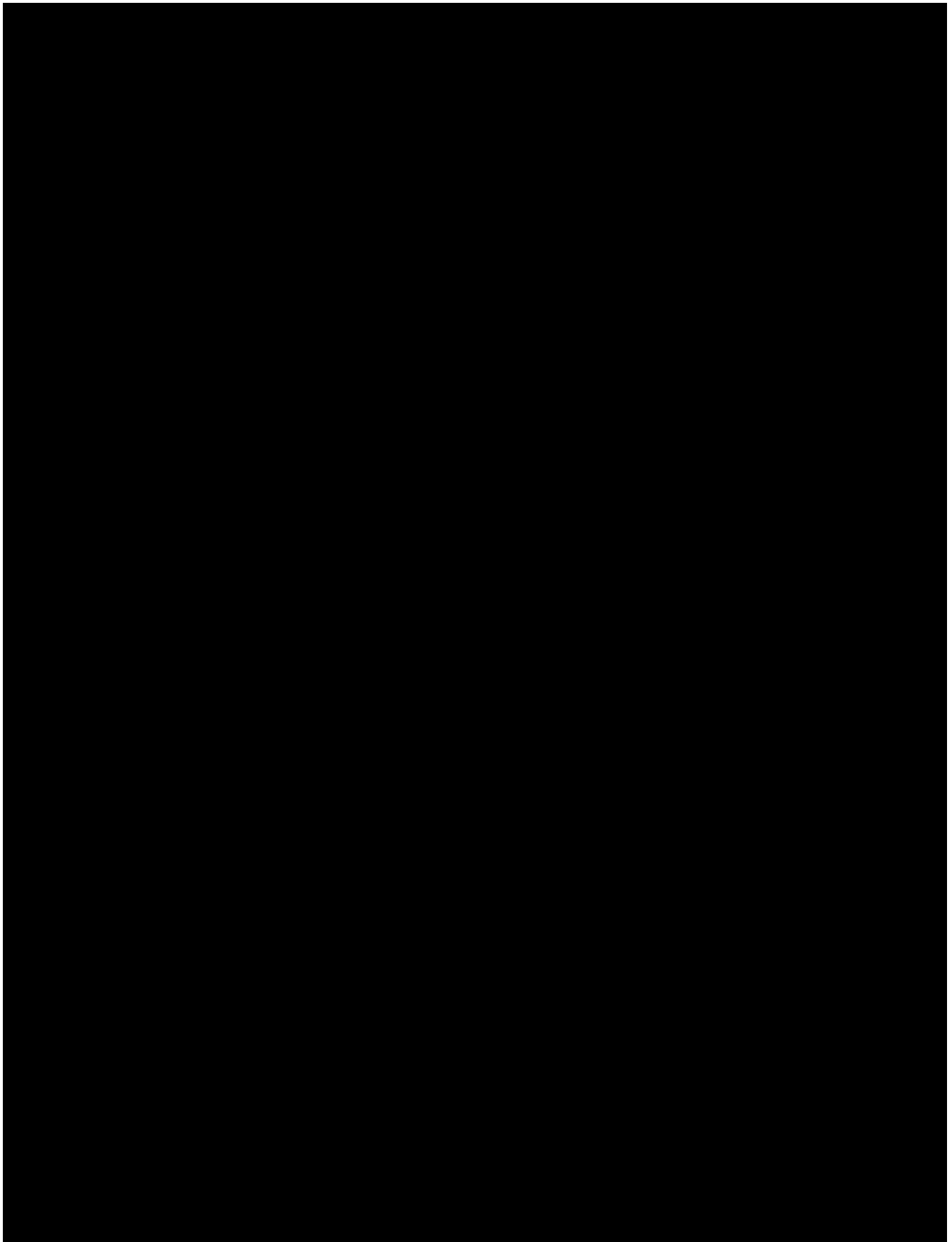
[REDACTED]

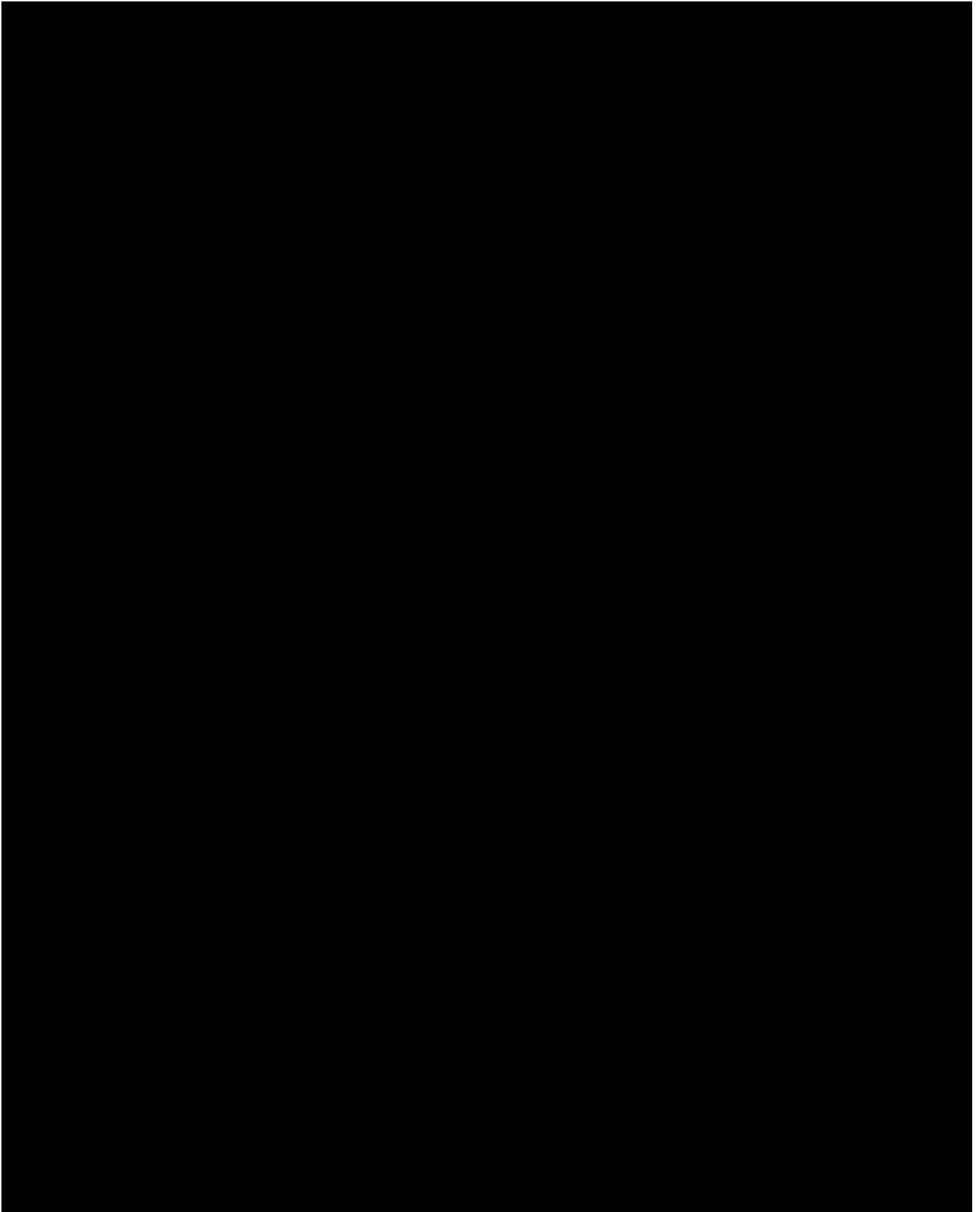


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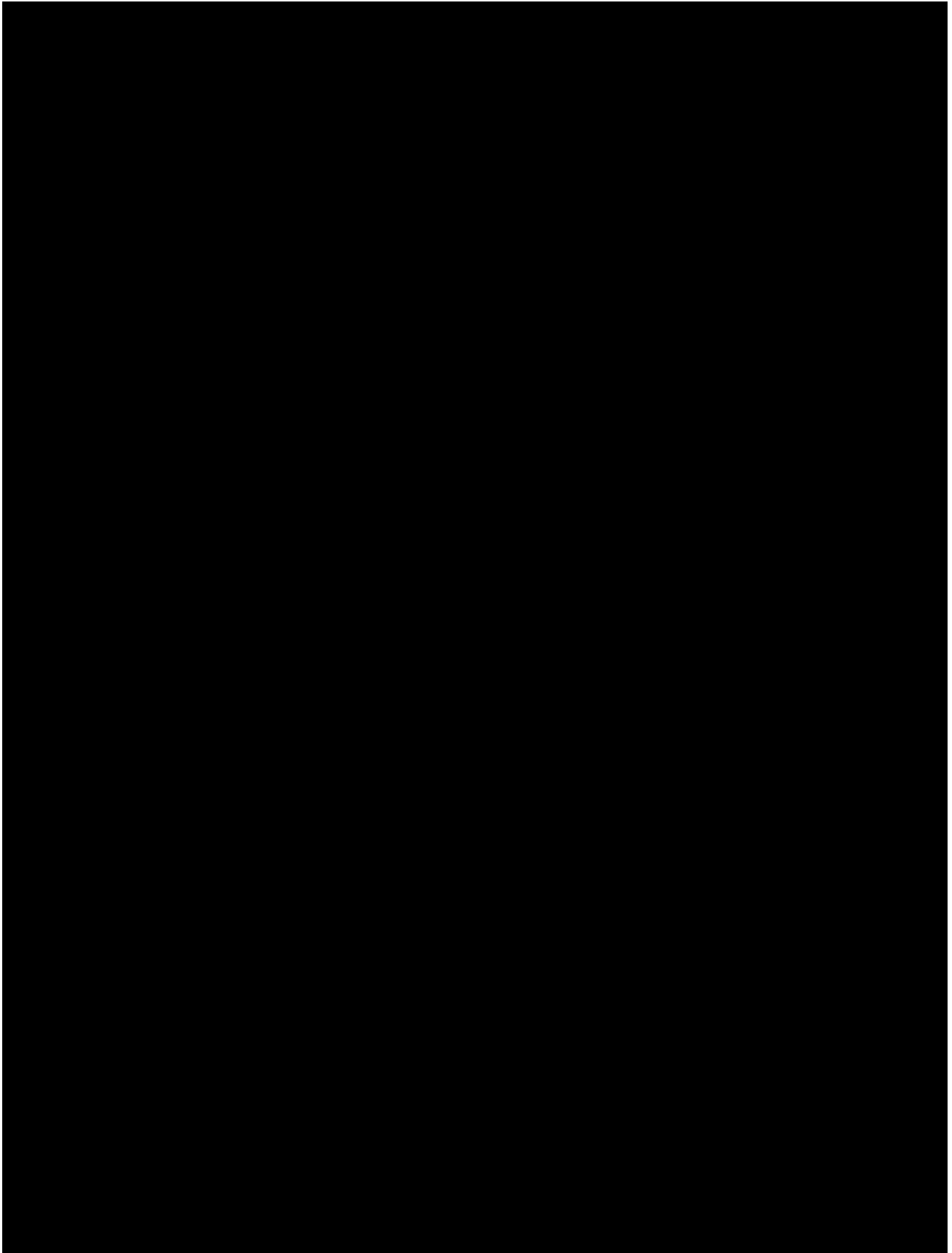


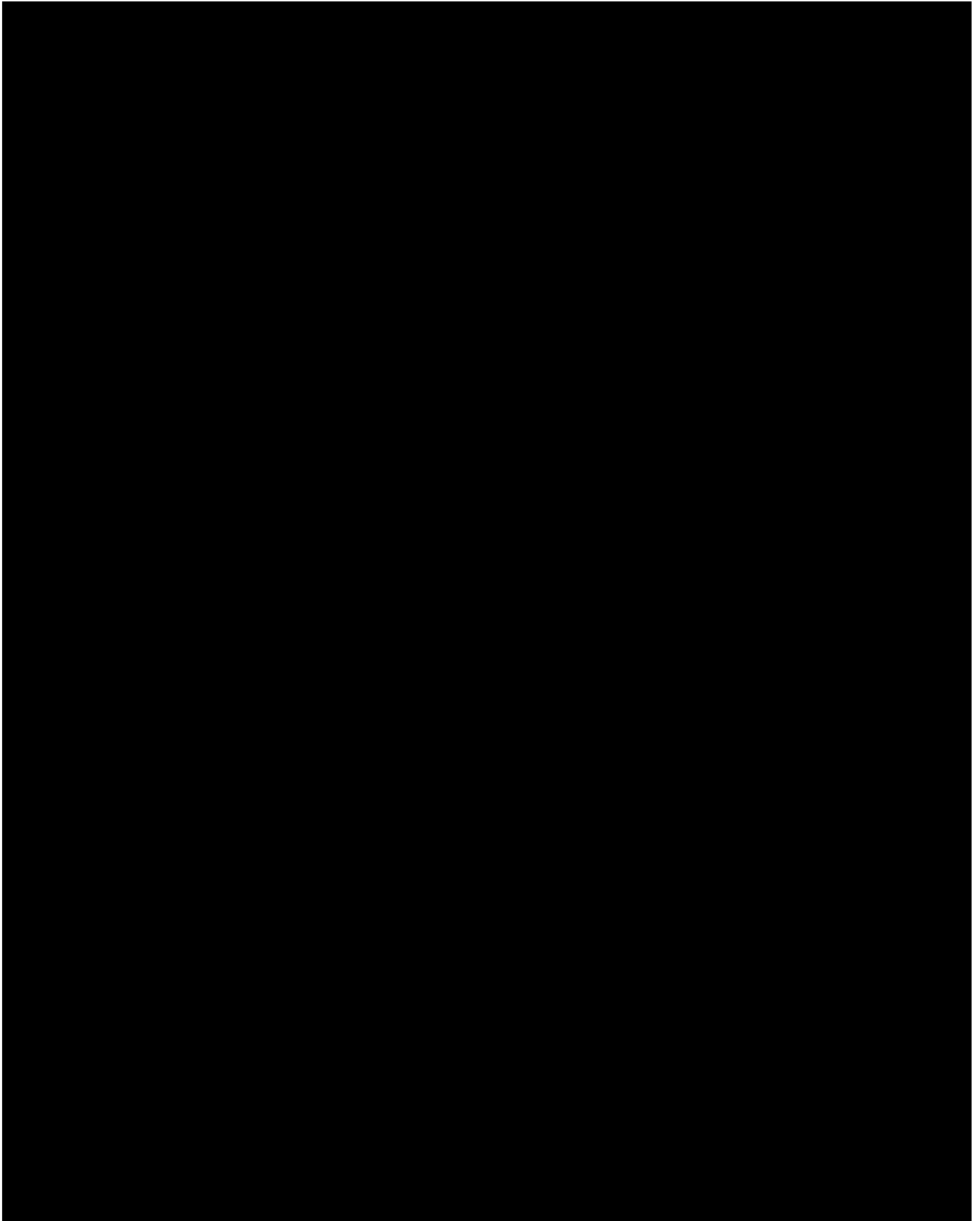
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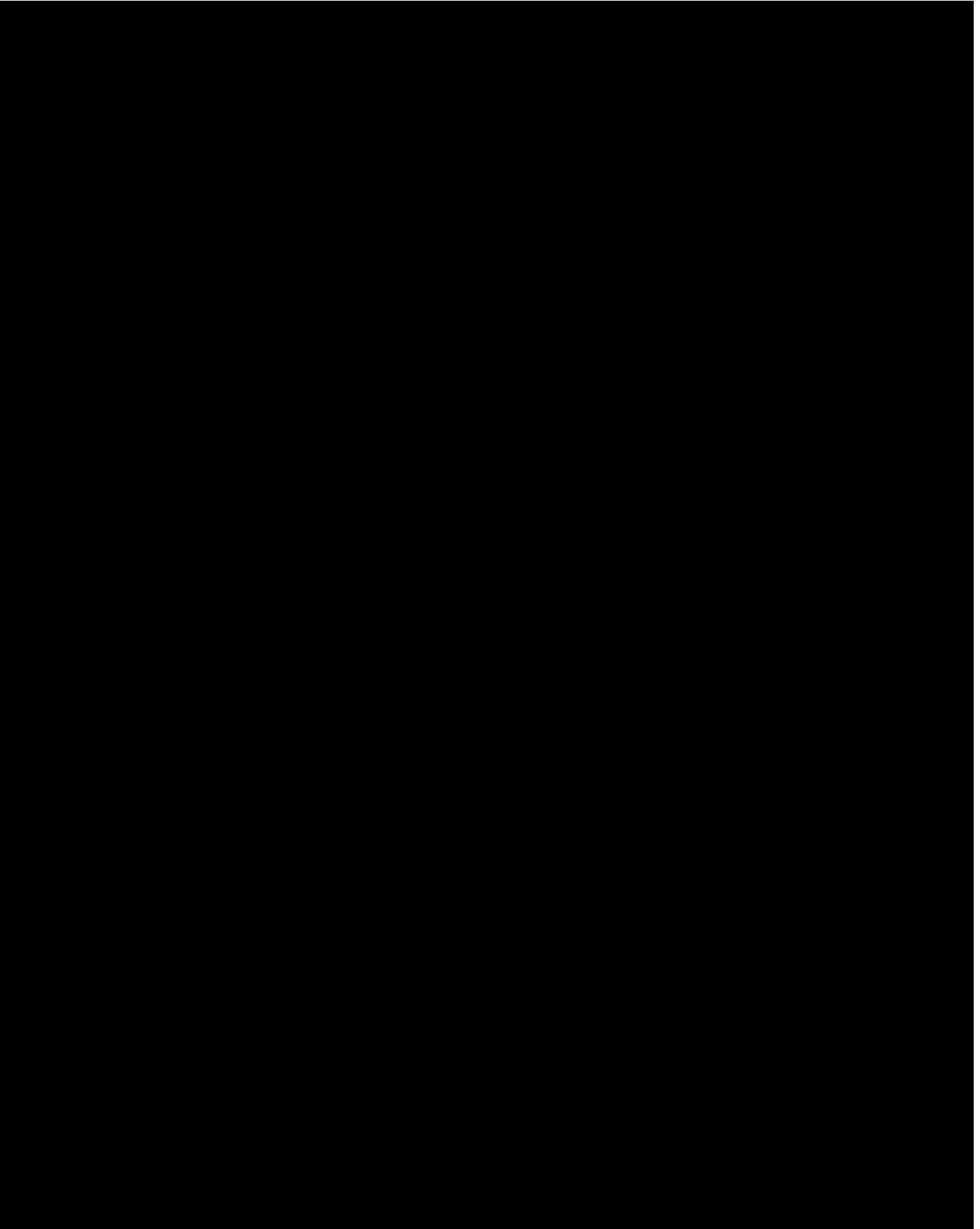


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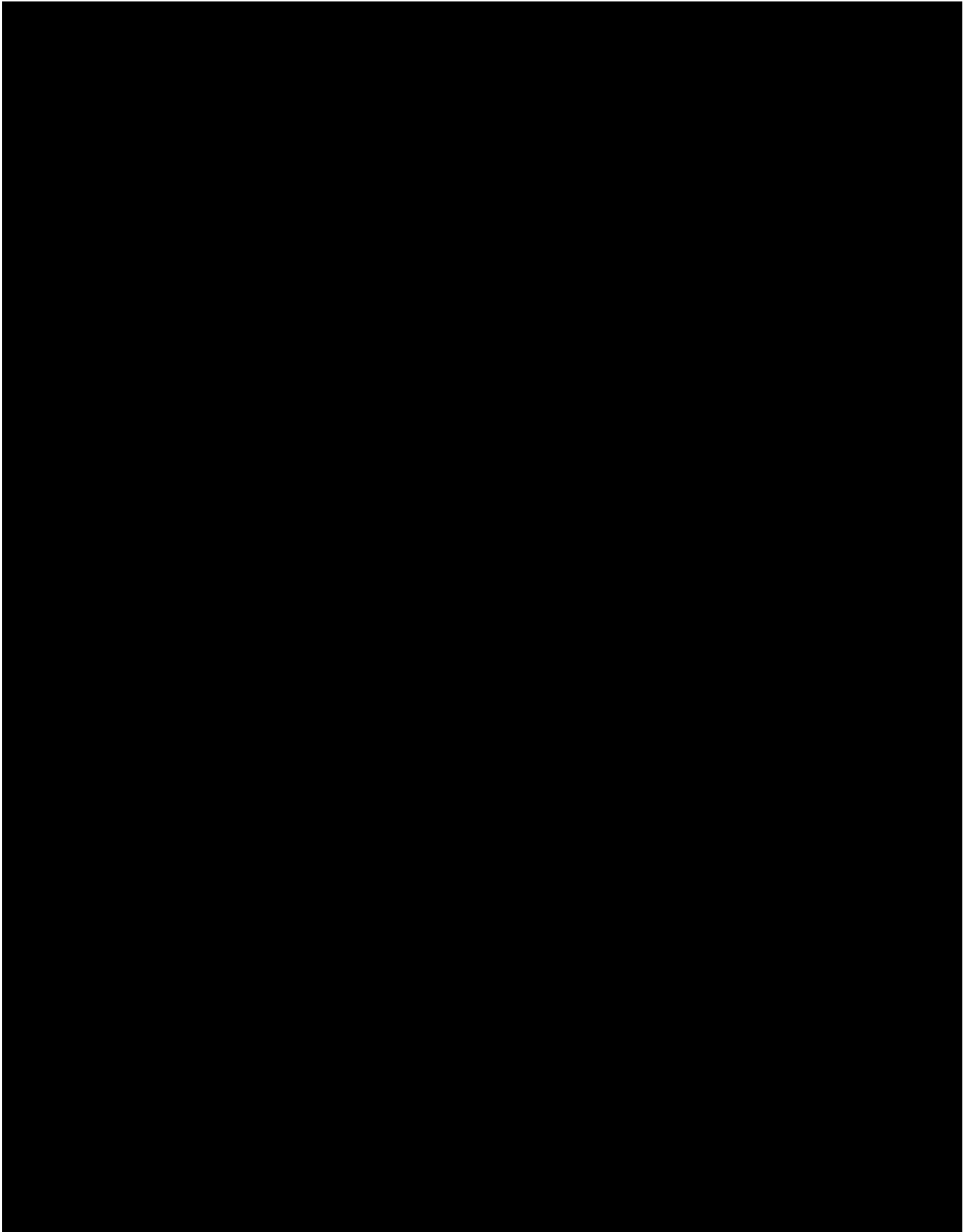




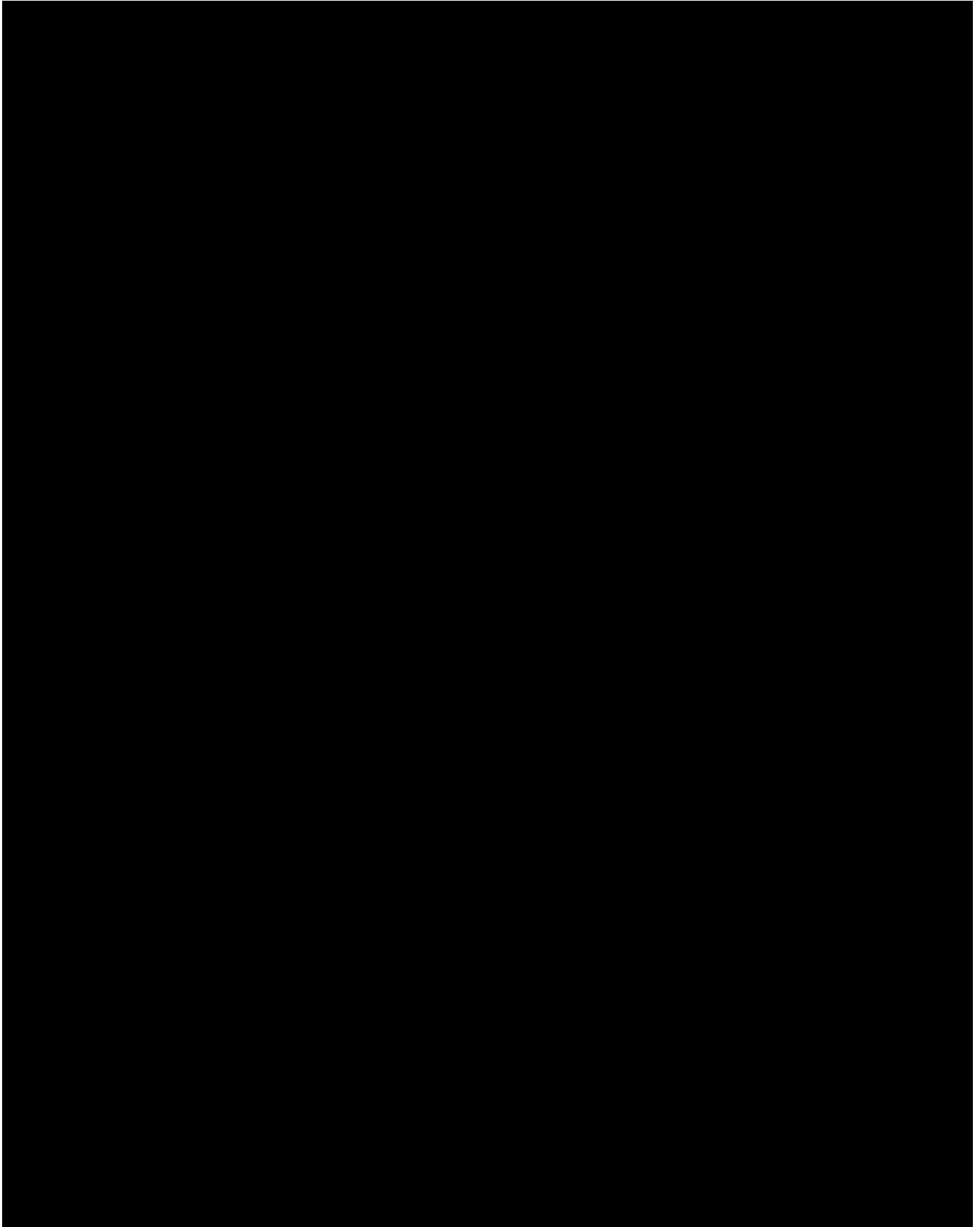
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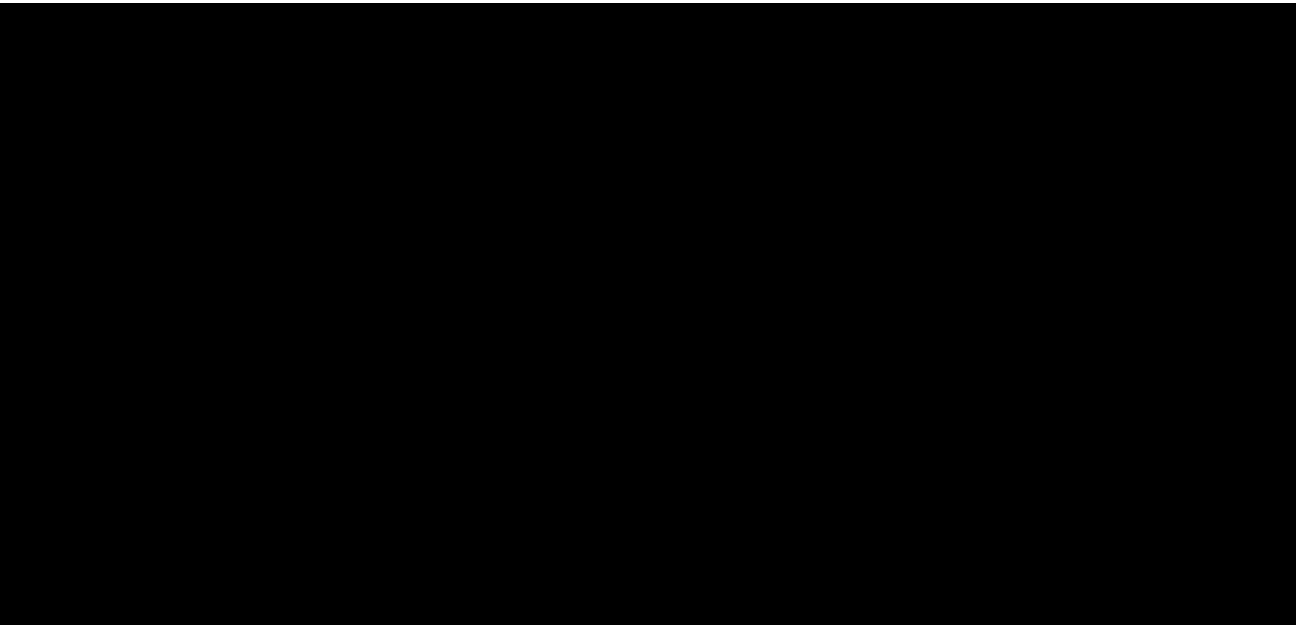
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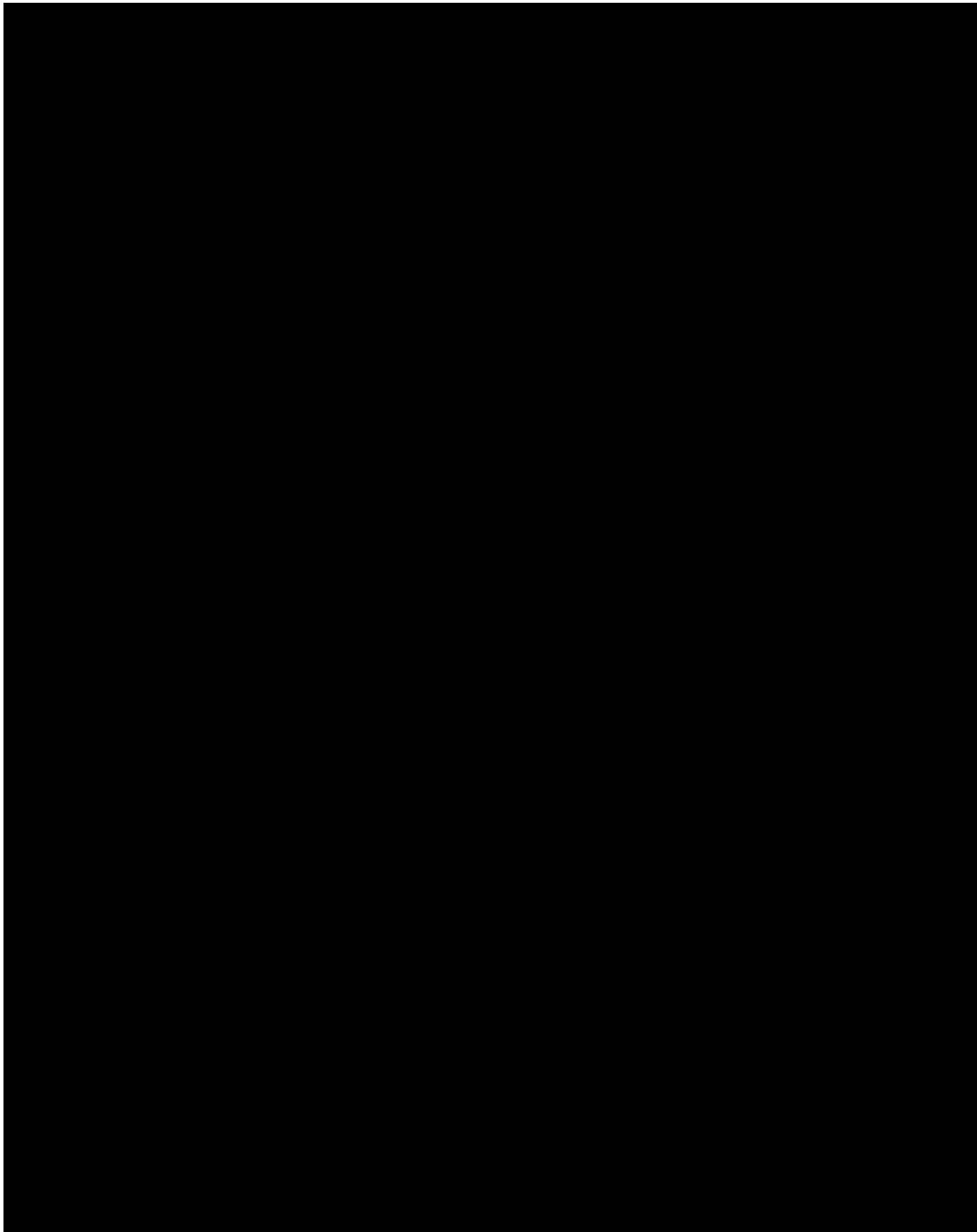


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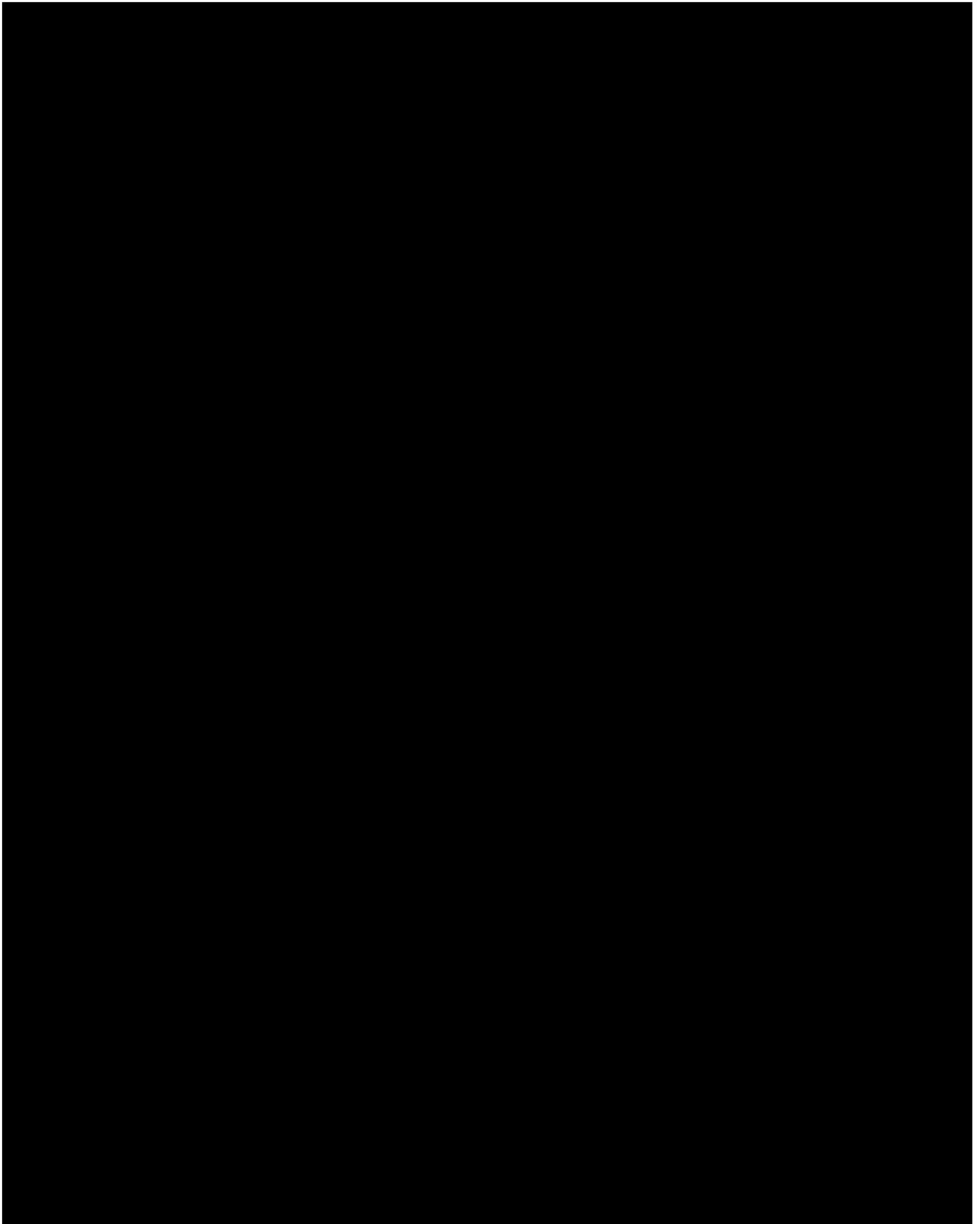


57. As set forth below, I have learned that following text conversations between Uribe and Arslanian in which Uribe expressed concern apparently about the [REDACTED] investigation, Menendez made a second call to [REDACTED] in September 2019, and that in late October 2019, Uribe expressed gratitude to Arslanian and Menendez following apparently good news, and subsequently set up automatic payment for the monthly payments on the Mercedes-Benz Automobile, which payments apparently have continued up until after Menendez, Arslanian, and Uribe were approached by the FBI in 2022.

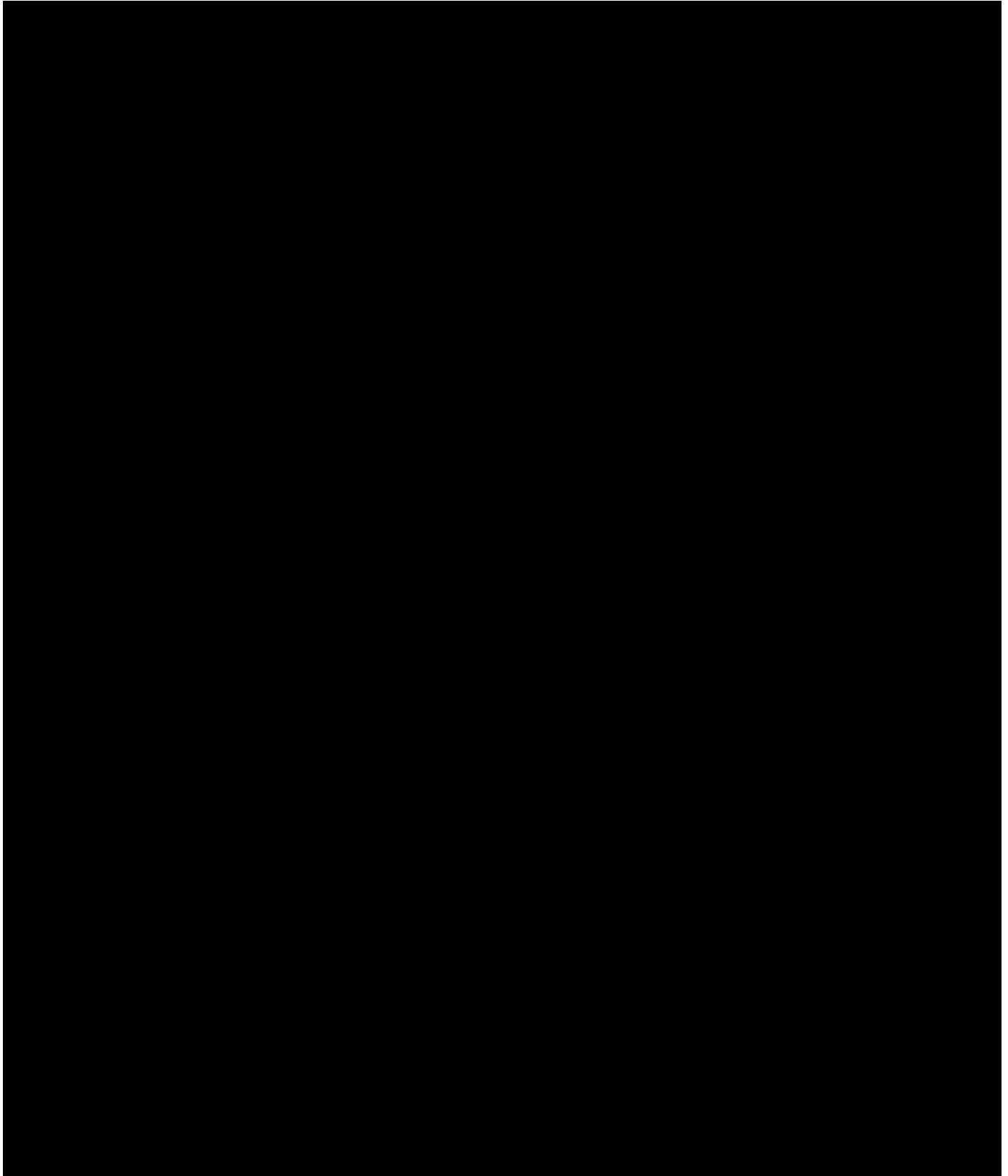




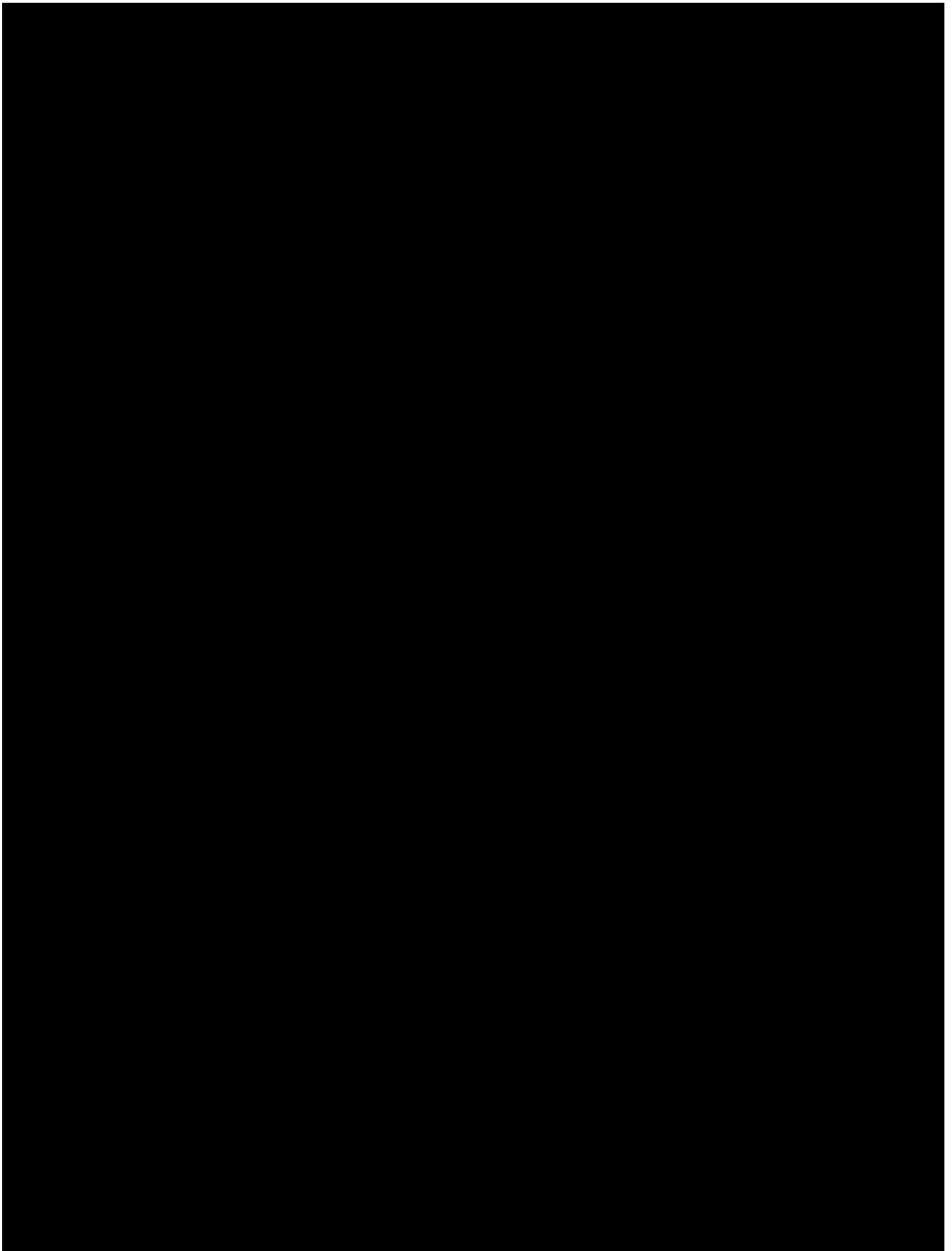
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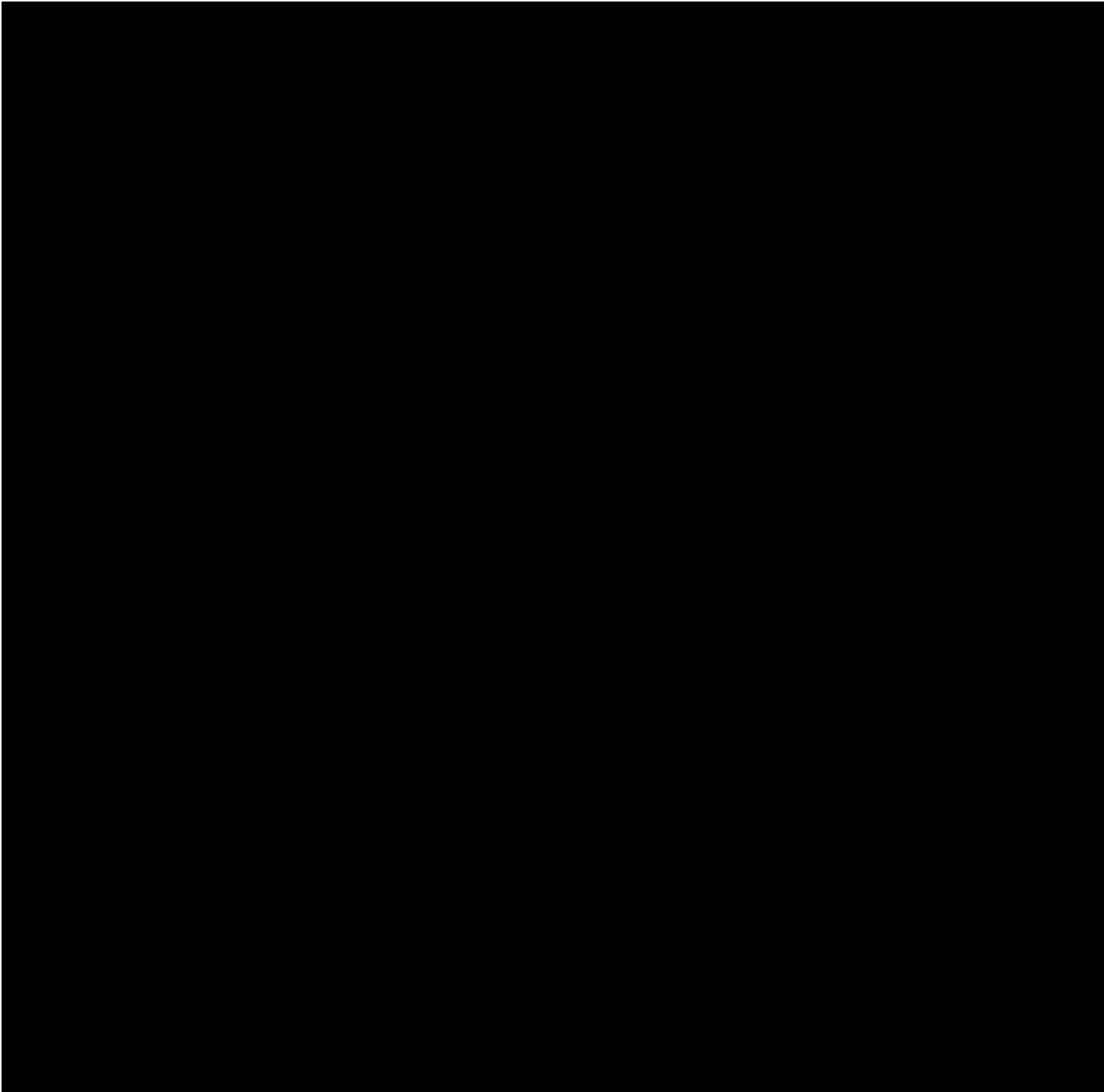
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59. As set forth below, based on my conversations with other law enforcement personnel and my review of Mercedes-Benz Financial Services records, the contents of the Uribe iCloud Account Media, and non-content information provided by Google, together with

information obtained pursuant to grand jury subpoenas, I have learned that on November 9, 2019, Uribe set up automatic payments on the automotive loan for the Mercedes-Benz Automobile and initially used the [REDACTED] Email Account to do so before creating a new email account for that purpose.⁷⁴ Specifically, based on those sources I have learned the following:

a. At approximately 8:29 p.m. on November 9, 2019, the [REDACTED] Email Account⁷⁵ was added as a contact account in Mercedes-Benz Financial Services records associated with the loan on the Mercedes-Benz Automobile.

b. At approximately 8:30 p.m. that night—*i.e.*, one minute later—Uribe texted [REDACTED] “Chequea tu email”, which roughly translates from Spanish to “Check your email.” Based on context, and my review of records obtained in the investigation, I believe Uribe was referring to an email that [REDACTED] would have received at the [REDACTED] Email Account from Mercedes-Benz Financial Services.

c. At approximately 8:32 p.m. that night—*i.e.*, two minutes after sending that text message—the Uribe Cellphone called a phone used by [REDACTED]. The call lasted approximately 14 minutes and 48 seconds.

d. At approximately 8:47 p.m. that night—*i.e.*, approximately when the call between the Uribe Cellphone and [REDACTED] cellphone was ending—the account [REDACTED] (*i.e.*, Uribe Email Account-2) was created. The recovery phone number for Uribe Email Account-2 is the number of the Uribe Cellphone.

i. The contents of the Uribe Email Account-1 Media show that [REDACTED] is a company that is registered to the name [REDACTED]

[REDACTED] is a business associate of Uribe, and, as noted in paragraph 44.l.iii, above, was identified by Uribe to Menendez Campaign Advisor-1 as a “friend” who would be attending the July 2018 fundraiser for Menendez.

⁷⁵ The contents of the Uribe Email Account-1 Media include emails attaching documents listing [REDACTED] as a freight carrier.

of [REDACTED] (who has stated to law enforcement officers that he is a relative of Uribe) and that Jose Uribe, using Uribe Email Account-1, sends emails on behalf of [REDACTED], and is listed on documents as associated with [REDACTED] Email Account was also copied or addressed on multiple pieces of correspondence concerning [REDACTED] Documents obtained from the New Jersey Division of Revenue and Enterprise Services (the “N.J. Revenue Division”) also show that [REDACTED] was created in 2010, suspended by the N.J. Revenue Division on or about November 16, 2013 for failure to file annual reports, and was reinstated on or about September 12, 2019.

- ii. From my review of the contents of the Uribe Email Account-1 Media, I know that in or about September 2019, Uribe sent a Santander bank employee named [REDACTED] two purported tax forms that allegedly show that Uribe has a 10% interest in [REDACTED] However, from my conversations with other law enforcement agents, I am aware that these forms are not on record with the IRS and appear to be fabricated. These fabricated tax forms, in turn, contain gross receipts numbers that [REDACTED] used in preparing an application to the Small Business Administration for an Economic Injury Disaster Loan (an “EIDL Loan”) on behalf of [REDACTED] [REDACTED] indicating that the EIDL Loan application was apparently fraudulent.

e. At approximately 8:50 p.m. that night—*i.e.*, several minutes after the call between the Uribe Cellphone and [REDACTED] cellphone ended—[REDACTED] texted Uribe, “Ya lo hice”, which roughly translates from Spanish to “I already did”.

f. At approximately 8:50 p.m. that night—*i.e.*, approximately 5 minutes after Uribe Email Account-2 was created—Uribe Email Account-2 was updated as the contact account for the loan on the Mercedes-Benz Automobile, replacing the [REDACTED] Email Account.

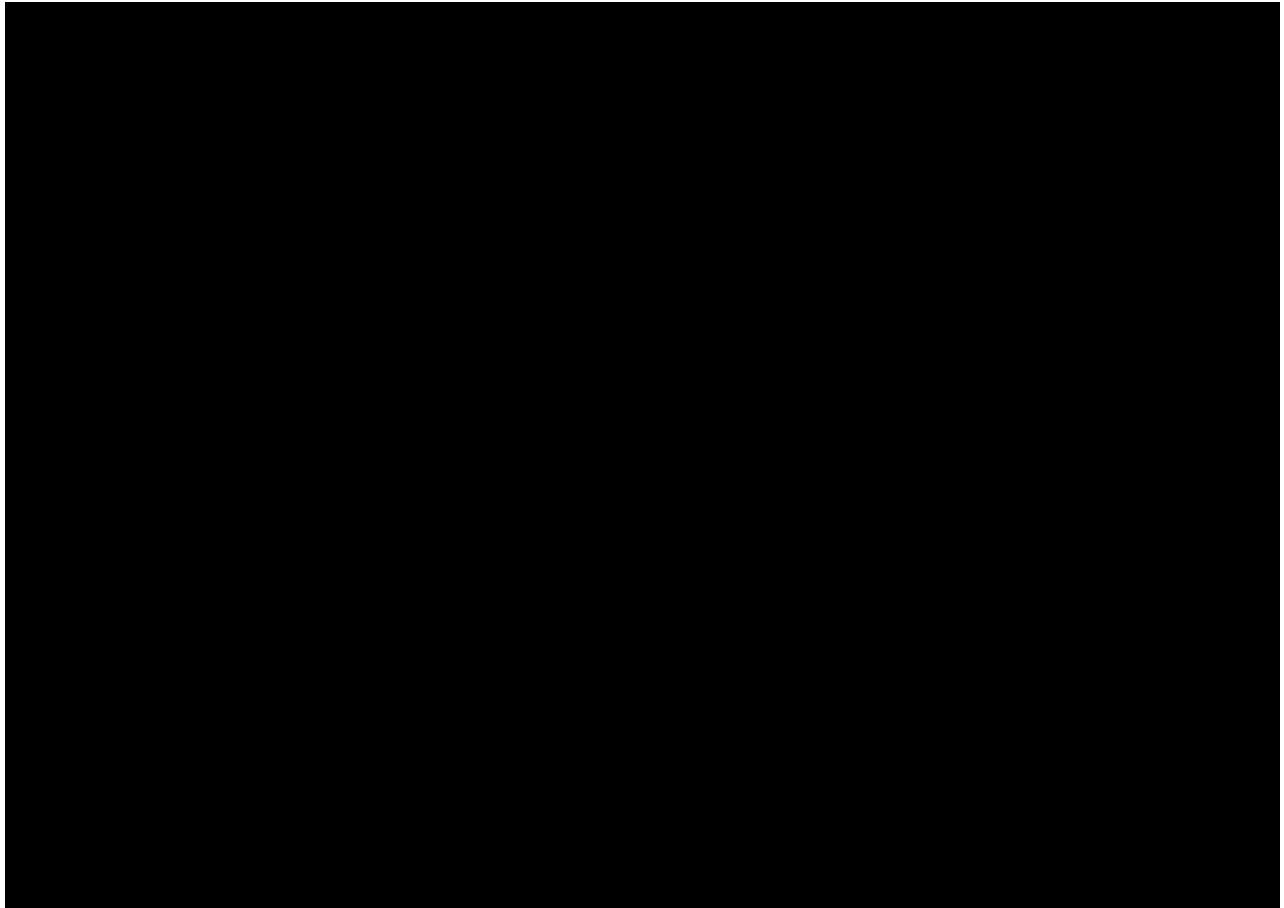
g. Approximately half an hour later, [REDACTED] texted Uribe, “Cuando puedo llamame”, which roughly translates from Spanish to “when you can call me”.

h. Several hours later, Uribe texted [REDACTED] “Excelente noticias. Vamos a orar.”, which roughly translates from Spanish to “Excellent news. Let’s pray.”⁷⁶

⁷⁶ From speaking to other law enforcement personnel and reviewing an FBI report, I know that on June 16, 2022, [REDACTED] was interviewed by telephone and denied providing Uribe with his email address to use to purchase or make payments on any vehicle.

i. Beginning on or about November 9, 2019, the monthly payments to Mercedes-Benz Financial Services were paid by automatic payment from a bank account owned by [REDACTED] Account”). Uribe is one of the two signatories on the [REDACTED] Account. Through early June 2022, the [REDACTED] Account had made over \$25,000 in payments toward the Mercedes-Benz Automobile.

j. Documents provided by Mercedes-Benz Financial Services reflect that in or about late June 2022—*i.e.*, after the service of subpoenas on and execution of search warrants regarding, among other individuals, Menendez, Arslanian, and Uribe—Arslanian contacted Mercedes-Benz Financial Services, changed the contact email address from the Second Uribe Email Account to the Arslanian Email Account, and made a \$4,000 payment on the Mercedes-Benz Automobile directly.





62. The contents of the Prior Hana Cellphone, the Seized Arslanian Cellphone, the Seized [REDACTED] Cellphone, the Arslanian iCloud Account Media, the 2020 Arslanian Email Account-1 Media, and the [REDACTED] iCloud Account Media, together with information provided in response to grand jury subpoenas, show that [REDACTED] apparently participated in providing carpeting services to Arslanian, including purportedly paid for by Hana, and received assistance for the immigration case of [REDACTED] brother. For example:

- a. On or about February 16, 2019, Arslanian emailed Menendez, among other things, "The basement guy and [REDACTED] will be here at 8 am tomorrow".
- b. On or about March 2, 2019, Arslanian texted [REDACTED] "I forgot to ask your brother's name," to which [REDACTED] responded "[REDACTED]". The next day, [REDACTED] emailed [REDACTED]

assaults to them and they wanted the Hana Romantic Partner to use the fact of these assaults as a means to "take [Hana] down." The Hana Romantic Partner refused.

Based on my conversations with other law enforcement personnel, I also know that on December 7, 2022, the Hana Romantic Partner was interviewed again and did not recount Arslanian mentioning that Hana had promised her a car during the July 2019 meeting.

Arslanian attaching photographs of a Board of Immigration Appeals decision dismissing the appeal of [REDACTED] from an order of removal entered by an Immigration Judge.⁷⁸

c. On or about March 24, 2019, Arslanian texted [REDACTED] “Hi [REDACTED] it is very kind of you to tell me I can call anytime but you have not been answering any of my text messages or voicemails please let me know about tomorrow Bob just went downstairs and asked me again why the basement is not finished. I understand you are busy if you cannot do it please let me know as I will have Home Depot come and do it.” [REDACTED] texted Arslanian, “Hi naden i will be at the office tomorrow I will let you know when i see will”.⁷⁹ The next day, Arslanian responded, in part, “Good morning . no problem I did not know he was coming with the guys for the carpet. But that’s not a problem please let me know.” and “I am sorry I reached out to you . I did not realize I had to go through Will to talk to you.”

d. On or about April 1, 2019, Arslanian texted Hana via WhatsApp, “You did not have one minute to text me on the way to the airport? It’s Monday you promised the guy would come for the carpet. But I’m sure you’ll be able to answer the phone about next Monday’s meetings and dinner”.

- i. Based on text messages exchanged between Arslanian and Hana in which Arslanian said that “Bob” was asking about the plan for the following Monday and who he would be meeting with in addition to the President of Egypt, and Hana listed another Egyptian official, I believe that Arslanian’s reference to “next Monday’s meetings and dinner” referred to, potentially among other things, then-planned meetings involving Menendez, Hana, and Egyptian officials.

⁷⁸ From speaking to other law enforcement personnel, I know that on June 30, 2022, [REDACTED] was interviewed by the FBI and prosecutors from the Southern District of New York, and stated, in substance and among other things, that [REDACTED] requested assistance from Menendez, through Arslanian, to enable his brother to travel abroad to visit their ailing mother, and this was the only favor [REDACTED] asked Arslanian or Menendez for. At a subsequent interview, [REDACTED] stated that he also asked Menendez for assistance or advice with a prospective marijuana business license.

⁷⁹ Based on the context, it appears that “will” refers to Hana.

e. The next day, [REDACTED] texted Arslanian, in part, “I’m just I’m gonna go Home Depot get it the stuff I’m going to come into your house”. Later that day, [REDACTED] texted, “I’m outside”.

f. Shortly after midnight on April 26, 2019, Arslanian texted Hana, “I got off the phone with him about an hour ago. I’m sorry to text you late but he left all of tomorrow free so he can help me in the house because he thought the carpet would already down. I text [REDACTED] twice today no answer once yesterday no answer he keeps telling me he will get back to me and never does I I asked him if he could at least drop the carpet off. could you please let me know tomorrow what is going on with it because now he’s really really pissed that he left the whole day free to help me move things from the garage and nothing can be done. I arranged for dinner tomorrow”.

g. On or about April 27, 2019, Arslanian texted Hana multiple pictures of what appeared to be a basement.

h. On or about April 28, 2019, Arslanian texted Hana pictures of what appeared to be a sketch of a basement with measurements, and wrote, [REDACTED] measured it. I remeasured it yesterday.”

i. On or about April 30, 2019, Arslanian texted [REDACTED] in part, “A guy just called me that he is coming in 30-40 minutes to measure the basement and to look to see what kind of carpet is needed . I thought we did all this two months ago. I hope he is still going to do the carpet today.” [REDACTED] responded, “Call you after are meeting Wael he confirmed yesterday with the guy to do it and give him the invoice I do get the carpet home but don’t worry about what I have Wael he is playing anyway”. Based on context, I believe “playing” is a typographical error

for “paying,” and that [REDACTED] was referring to Hana paying for the basement carpeting renovations.⁸⁰

j. On or about June 24, 2019, Arslanian texted [REDACTED] the name and phone number of an attorney, and wrote, “He is the best immigration lawyer. Bob spoke to him today. Tell him senator Bob Menendez told you to call him”.⁸¹

k. On or about July 11, 2019, Arslanian texted [REDACTED] “I changed the lawyer’s appointment for tomorrow. She is very very unhappy . She does not think I am serious. Please make sure I have every single possible paper tonight.” [REDACTED] responded, “I just speak to [REDACTED] going to bring it with him every single thing he have”. Later that day, Arslanian texted [REDACTED] “VERY VERY VERY important to get bank picture.” [REDACTED] responded, “I’m gonna try make it happen tomorrow”, and Arslanian replied, “That is going to make it the case in two weeks go away”. [REDACTED] responded, “Who case” “?”, and Arslanian replied “Your brother” [REDACTED] then wrote, “Thanks so much” followed by a thumbs-up and a prayer emoji.

63. Based on the contents of the Prior Hana Cellphone, the Seized Arslanian Cellphone, the Seized [REDACTED] Cellphone, the Arslanian iCloud Account Media, and the [REDACTED] iCloud Account Media, together with information provided in response to grand jury subpoenas, I have

⁸⁰ Arslanian also corresponded with Uribe concerning the carpet. For example, also on April 30, 2019, Arslanian texted Uribe, “Good morning. I have my car back. THANK YOU I’ve been emptying the basement with my son all morning hopefully they will put the carpet by noon as I was told yesterday and the day before yesterday.” Uribe responded, “Good morning girl. Enjoy your car. Let’s hope on your carpet.” That afternoon, Arslanian texted Uribe, “LMAO [*i.e.*, Laughing My Ass Off] ... no carpet”. Uribe then texted Arslanian “Call Neden” and “I do not have his number”. I believe based on the context that when Uribe was stating “I do not have his number,” he was referring to not having [REDACTED] number.

⁸¹ As noted in footnote 97, below, this attorney was also the [REDACTED] at all relevant times.

learned that [REDACTED] provided additional home improvement services and gifts to Menendez and Arslanian. For example, based on those sources, I have learned the following:

a. On March 11, 2020, Arslanian texted [REDACTED], in part, “Is it possible to put cement in the hole in front of the front door?” and remarked that she had been trying to cut branches on her property and asked for the use of an electric saw. [REDACTED] responded, “No problem I’m gonna be there for o’clock we fix it for you”.

b. On April 17, 2020, [REDACTED] texted Arslanian, “Hi Nadeen please can you open the front door I leave something for you”. The next day, Arslanian texted [REDACTED] in part, “Good morning [REDACTED]. just saw this . it is amazing I love love love taking pictures. How did you know?” and, “I can’t wait for Bob to wake up for me to show it to him. Thank you [REDACTED] so much.”

c. On May 16, 2020, Arslanian texted [REDACTED] “Last night the mantle on the fireplace broke and fell if you find two brackets to hold the shelf up can you please get them I will pay you for everything when you get here”.

64. Based on the contents of the Seized Arslanian Cellphone, the Seized [REDACTED] Cellphone, the Arslanian iCloud Account Media, and the [REDACTED] iCloud Account Media, together with information provided in response to grand jury subpoenas, I have learned that in or around May and June 2020, [REDACTED] performed some home improvement services for Arslanian and Menendez,⁸² and proposed an arrangement of some sort with Menendez. Based on those sources, I have learned the following:

⁸² Based on my participation in the investigation, including my review of messages between [REDACTED] and Arslanian, as well as documents produced by financial institutions in response to grand jury subpoenas, I believe that Menendez, who was at that point engaged to Arslanian, had moved into Arslanian’s house and lived in her house as of at least in or about May 2020.

a. On May 22, 2020, Arslanian texted [REDACTED] "Thank you so much [REDACTED] You are God sent. I will ask him tonight." [REDACTED] responded, "Thank you and God bless you." The next day, Arslanian wrote, in part, "Good morning . I spoke to him last night and he said it's a very good idea and he will help you with that." Shortly after that, Arslanian wrote, "He said he could not believe what a perfect job you did a professional could not have made it look any better than what you did thank you". Several minutes later, [REDACTED] responded, in part, "Thank you for asking about my favor thank you so much".

b. On May 24, 2020, Arslanian texted [REDACTED] "Do you have some thing to unscrew these two screws? Bob wants to clean the window but he cannot take the outside window off . If you are available today or Tuesday to help him he does not know how to take this window out. Tomorrow he is not here." [REDACTED] responded, "Hi Nadeen don't worry I have all the tools Can I come in to you Tuesday I do for you And I bring in the corner with me and the extension two". Later that day Arslanian texted, "If you have a power washer can you bring it with you or else if you can rent it we will pay you for it for the day Bob wants to power wash the back". Approximately half an hour later, [REDACTED] wrote, "Don't worry I'm gonna bring it everything I'm gonna clean all the house from outside".

c. On May 26, 2020, Arslanian, using the Arslanian Cellphone, left [REDACTED] a voice message in which she said, "Hi [REDACTED] it's Nadine, I'm sorry to bother you, um, Bob was gonna do a CNN interview and he canceled it because he wanted to do the work outside with you. I wanted to know if you had an emergency. Please let me know so I can tell him 'cause he's been waiting outside. I'm sorry to bother you and I appreciate everything you're doing, I just wanted to know the schedule. Thank you [REDACTED]" Later that day, Menendez, using the Arslanian Cellphone, left [REDACTED] a voice message in which he said, "Hey [REDACTED] it's Mr. Menendez, I hope you're OK,

uh, I'm not sure if you got stuck at something or had some emergency but just let us know, 'cause I'm here waiting for you and I don't want to lose the day. Thanks [REDACTED] uh, give us a call, bye."

d. On May 27, 2020, Arslanian texted [REDACTED] "He is on Tv interviews today from 12-5 pm . Don't worry we will get it done ." and "I can't believe how much you do . He was walking around yesterday and was so happy ."

e. On June 5, 2020, Arslanian texted [REDACTED] "Good morning [REDACTED] we are home. Today's the only day Bob is home all day. He was asking what time is good for you to come over?" [REDACTED] responded, "Any time I am home today let me know when it's good for you to come in". Arslanian then replied, "Do you have a small can of black paint? Bob wants to paint the bottom of the front door. It's supposed to rain around 6 pm so if you can come now it's great. Whatever papers you have also for the liquor store I don't know if you need papers also bring them with you." and, "Thank you so very very much [REDACTED] replied, "Can I coming around 2:30," and Arslanian wrote back, "Great . Thank you [REDACTED]"

f. On June 7, 2020, [REDACTED] texted Arslanian, "I think the reception is very bad here can you talk when I come and see you after 45 minutes".

g. On June 11, 2020, Menendez, from the Menendez Office Number—*i.e.*, the same phone number that called [REDACTED] on January 29, 2019, as described in paragraph 49.o—left a voice message for [REDACTED] in which he said, "Hey [REDACTED] it's Bob Menendez, hope you're well, just wanted to call and say thank you so much, uh, when I got back, the paint job looks fantastic, the stairs and the solarium, uh, look great, uh, the front looks great, really helped, uh, transform the house so thank you so much for all of, uh, your work, and, uh, I am working on what we talked about, I put out a bunch of feelers let's see what happens, and I look forward to seeing you in the future. Take care."

i. At 2:02 p.m. that day, Arslanian texted [REDACTED] "Hi [REDACTED] I hope all is well. Bob left you a voicemail this morning. [REDACTED] responded, "Hi NADINE.I just got bop,s massage tell him any time and whatever you need.."

h. On June 27, 2020, Arslanian, using the Arslanian Cellphone, left a voice message for [REDACTED] in which she said, "Hi [REDACTED] It's Nadine. I hope you are well, the whole family is well. Bob was asking if you had any updates, if you got in touch with the guy. Any updates, anything happened. He's been asking me yesterday and today about how it's going. So I hope it's going well and the family are well."

i. Between approximately July 3, 2020 and August 12, 2020, Arslanian and [REDACTED] exchanged a number of texts regarding [REDACTED] fixing Arslanian's garage door and bringing a friend to cut down tree branches from Arslanian's property, including a text from [REDACTED] on August 12, 2020 saying, "Hi Nadine I'm outside". On August 13, 2020, Arslanian texted, "Bob is soo happy that the car is in the garage especially with all the rain we are having. Because it's a soft top sometimes water comes in."⁸³ and "I forgot to ask you I was in the shower how much it cost for the garage door please you have to tell me when you come and how much for the tree cutter people." and "Thank you for everything. [REDACTED] responded, "You're very welcome call me anytime".

i. On September 3, 2020, Arslanian texted [REDACTED] "Hi [REDACTED] I just wanted to let you know that the man that you got the garage parts from please get a refund from him . do not pay the bill . the garage has not been working the belt is broken again so I called somebody they're going to come and change the whole unit tomorrow but please get your money back for the garage

⁸³ Based on context, I believe the "car" with the "soft top" that Arslanian referred to is the Mercedes-Benz Automobile that Uribe was paying for. Based on conversations with an FBI agent who conducted surveillance outside of Arslanian and Menendez's residence on or about May 12, 2022, and my review of a photograph taken by the FBI during that surveillance, on that date a Mercedes-Benz convertible with a soft top was parked outside the residence.

doors thank you [REDACTED] responded, "I'm sorry for her than a gene but I already paid the company don't worry about it".⁸⁴

- ii. On October 22, 2020, Arslanian texted Menendez, "You got an envelope delivered from the people who cleaned up the branches after we cut the trees down".⁸⁵

65. From my review of materials, I have learned that the contents of the [REDACTED] Cloud Account Media and Arslanian iCloud Account Media, together with information provided in response to grand jury subpoenas, show that beginning in or around at least August 2020 [REDACTED] and [REDACTED] who is identified on [REDACTED] website as the company's owner and CEO, both participated in seeking Menendez's use of his influence to obtain COVID-19 testing contracts and/or other authorization for [REDACTED] with various New Jersey municipalities, apparently in exchange for, as described in paragraph 66, tens of thousands of dollars which [REDACTED] participated in paying to Arslanian and her company. Specifically:

- a. On August 14, 2020, the [REDACTED] cellphone engaged in multiple telephone calls with the [REDACTED] Cellphone, and multiple calls with the Arslanian Cellphone.

- b. On August 16, 2020, Arslanian texted [REDACTED] in part, "Hi [REDACTED] It's two days now I am waiting for an answer. Your friend said he would let us know that same day. It's been two days. Did you hear back from him?" [REDACTED] then forwarded this text message to [REDACTED]

- c. On September 21, 2020, the Arslanian Cellphone called the [REDACTED] Cellphone. On September 23, 2020 (*i.e.*, two days later), the Arslanian 007 Phone called the [REDACTED]

⁸⁴ I believe that "I'm sorry for her than a gene" might be an inaccurate voice-to-text software rendition of "I'm sorry to hear that Nadine."

⁸⁵ From speaking to other law enforcement personnel and reviewing an FBI report, I have learned that on June 16, 2022, [REDACTED] was interviewed by the FBI and claimed that he had provided Arslanian, among other things, a lawnmower, and that when Menendez learned of the lawnmower, he became angry and told Arslanian she had to pay [REDACTED]

Cellphone. The Arslanian Cellphone and the Arslanian 007 Phone engaged in multiple calls and several text messages with the [REDACTED] Cellphone over the ensuing months.

d. On October 8, 2020, [REDACTED] a texted [REDACTED], "Hi Nadine , hope you are well and safe in this crazy Pandemic. I miss you guys so I said let me check if you need anything I can do for you or Bob .hope to hear from you soon". Approximately two minutes later, [REDACTED] sent this message verbatim to Arslanian.

e. On October 12, 2020, [REDACTED] texted Arslanian, "Hi Nadine I can't coming today for the backyard because it's raining tell me what date is good for to come in ? My friend he doesn't receive phone call today". Arslanian responded, "Tomorrow we are not home . any other day that's good for you we are home Wednesday or Thursday." [REDACTED] replied, "Ok", and then wrote, "My friend he doesn't receive any phone calls".

f. On October 26, 2020, [REDACTED] texted Arslanian, "My friend he doesn't receive anything".

g. On November 2, 2020, [REDACTED] texted Arslanian, "I'm outside". Approximately 2 hours later, Arslanian texted [REDACTED] "Can't thank you enough for today".

h. On November 23, 2020, the Menendez Cellphone initiated calls with the personal cellphones of the [REDACTED] and the [REDACTED]

[REDACTED] These were the first telephone contacts reflected in the available records between the Menendez Cellphone and the [REDACTED], and the first telephone contacts reflected in the available records since 2019 between the Menendez

Cellphone and the [REDACTED] Through December 16, 2021, the Menendez Cellphone engaged in two calls with the [REDACTED] and several calls with the [REDACTED]⁸⁶

i. On November 23, 2020—*i.e.*, the same day as the Menendez Cellphone contacted [REDACTED]—Arslanian texted [REDACTED] from the office of the mayor in [REDACTED] will be contacting you for [REDACTED] and “Please call me [REDACTED]”⁸⁷ and “I have 5 additional cities for you as well but I will call you about them later. That is five other ones than the ones we spoke about earlier this morning.”⁸⁸

j. On December 6, 2020, Arslanian texted [REDACTED] “Hi. Out of these three machines what is the earliest that you have been able to get a delivery and if you have any contacts please let me know. I’m trying to do this on my own first. Because people are upset with him that he promised them all the testing and he told me that I never told him we did not have the machines ready” and two crying emoji, and “It was two weeks almost a face-to-face meetings with every single mayor to get all these OK for us and he is very upset and embarrassed so I’m trying to do everything I can to see how we can get the machines.” Based on the context—including that this text came almost two weeks after the November 23, 2020 calls and text messages about contacts with New Jersey mayors described in paragraphs 65.h and 65.i, above—I believe that the “he” Arslanian is referring to is Menendez, and that when she states “It was two weeks almost a face-to-face meetings with every single mayor to get all these OK for us and he is very upset and

⁸⁶ Additionally, the Menendez Cellphone has had a number of contacts with the personal cellphone of the [REDACTED] dating back to at least 2018 and through at least 2021.

⁸⁷ I believe [REDACTED] is a misspelling of [REDACTED] at the time and an immigration attorney, as referenced in footnotes 81 and 97.

⁸⁸ The investigative team does not have access to calling records for Menendez’s office phones for November 23, 2020.

embarrassed,” Arslanian is referring to Menendez’s contacts to New Jersey mayors to secure authorization for [REDACTED] to perform testing.

k. On December 19, 2020, [REDACTED] texted Arslanian, “Hi Nadine, how’s everything? I received the camera system. If you have a chance we can meet today, let me know. Thank you!”⁸⁹ Arslanian responded, “I told Bob he is so so happy. He says now he doesn’t have to worry all the time about me. I am going at 6o’clock to go pick up my son. But I will be home all day tomorrow and all day Monday if that works for you.” and “Thank you so so much”. Later that day [REDACTED] wrote, “Okay, I’m gonna give you a call before I come tomorrow. I’ll install the camera system for you and I’ll get everything and if you need anything let me know.”

l. On December 22, 2020, [REDACTED] texted Arslanian, “I forgot to ask you do you want me to bring it [REDACTED] with me tomorrow?” I believe, based in part on the context that much of the content on the [REDACTED] iCloud account is in Arabic, that [REDACTED] may be an incorrect rendering of [REDACTED].⁹⁰ The next day, Arslanian wrote to [REDACTED] writing, “He said He will have to meet him sometime this weekend out somewhere.”

m. On January 8, 2021, Arslanian texted [REDACTED] “I mailed the check .” [REDACTED] responded, “This check for what ?” Arslanian replied, [REDACTED] laboratory for the blood work he did”. [REDACTED] then wrote, “Don’t send this bill I will take care of this check don’t worry about it”. Arslanian wrote, “No no I already mailed it 2 days ago.” [REDACTED] responded, “Oh my God I already took care of it” and “Can you please stop the check”.

⁸⁹ I believe, based on context, that “the camera system” refers to a home surveillance camera system for Arslanian and Menendez’s home.

⁹⁰ [REDACTED] phone number is saved in the [REDACTED] Cloud Account Media under the name [REDACTED] and in other portions of the [REDACTED] iCloud Account Media, [REDACTED] refers to [REDACTED] such as paragraph 65.w.

n. On January 11, 2021, [REDACTED] texted [REDACTED], "Hi [REDACTED] Just to let you know I didn't receive any calls or emails today also I txted [REDACTED] because he asked me to let him know if I didn't receive anything till Monday".⁹¹

o. On January 13, 2021, [REDACTED] texted Arslanian, "Hi Nadine I hope everything is okay I want to let you Know my friend doesn't receive any phone call no e-mail for right now Let me know if I have to do anything".

p. On January 16, 2021, Arslanian texted [REDACTED] "He LOVES the bottle . Thank you. [REDACTED] responded, "You're very welcome".

q. On February 15, 2021, Arslanian, using the Arslanian Cellphone, left a voice message for [REDACTED] stating, "Hi Nader, *how are you?* I hope I am not waking you up. I wanted to tell you *that my husband came yesterday, and worked until two O'clock and woke up at 6:30. The only thing he said to me is the [REDACTED] called him on the phone twice and is very mad at him, because no one called him for the COVID test. He wants the COVID testing done. So, I do not know if [REDACTED] has the number or not but it is in Plainfield, NJ. So if you do not have the number, I will give it to you in the afternoon, but if he has it have him give him a call. I do not know if they are open today, it is a holiday, but tomorrow for [REDACTED]*

[REDACTED]⁹²

r. On February 16, 2021, [REDACTED] texted Arslanian, "What time u wanna me to come and install the tv for u". Later that day, he texted, "Iam outside". The next day, Arslanian texted [REDACTED] "Bob Just saw the sink and the pink cigar lighter filled with fluid gas. He is so so

⁹¹ Based on public information and other references to calling a [REDACTED] in the [REDACTED] iCloud Account, I believe that [REDACTED]

[REDACTED] New Jersey-based health insurance company.

⁹² The italicized portions in this paragraph represent preliminary draft translations, subject to revision, of portions of the voice message that were spoken in Arabic.

happy. Thank you very very very very very very very very very very very very very very much". [REDACTED]

responded, "You are very welcome" and sent a thumbs-up and a prayer emoji.

s. On February 19, 2021, Arslanian texted [REDACTED] "If you have the Tv and bracket let me know. Will be home by 9 pm. Need to speak to you". [REDACTED] responded, "Hi Nadine, please before you get home by 30 mins let me know. I have everything ready for you and get home safe!" Later that day, [REDACTED] texted, "I am going be there Do you want me to bring [REDACTED] with me today or not".⁹³ Arslanian responded, "Let me ask Bob . He is still speaking".

t. On February 22, 2021 [REDACTED] texted [REDACTED] "I spoke to the Council he said I am busy now call me in an hour" and "I called [REDACTED] and left him a voicemail". Based on the context and public information, I believe that the reference to [REDACTED] [REDACTED] at the time [REDACTED] forwarded both of these messages to Arslanian. Within a minute of receiving the forwarded message concerning leaving a voice message for [REDACTED] Arslanian responded to [REDACTED] "Ok" with a thumbs-up emoji, and "Did you leave him your number so he could call you back? Thank you for all you do" with a prayer emoji. [REDACTED] forwarded Arslanian's message to [REDACTED] and responded "Yes" to Arslanian.

u. On February 23, 2021, an individual in the mayor's office in [REDACTED] New Jersey (the [REDACTED])⁹⁴ texted [REDACTED] "Sorry, I can't talk right now." [REDACTED] responded, "My name is [REDACTED] Please give me a call when you have a chance". The [REDACTED] replied, "How did you get my number". Several minutes later, [REDACTED]—who had exchanged a

⁹³ [REDACTED] then forwarded, by text message, this response to [REDACTED]

⁹⁴ Arslanian had previously texted [REDACTED] his individual's number and identified him as an employee in [REDACTED] which I believe from public information to be a typographical error for [REDACTED]

series of short telephone calls with [REDACTED] leading up to this message—texted [REDACTED] “Hi my name is [REDACTED] I am from [REDACTED] and I been refereed to you by senator bob Mendez to do COVID testing”. [REDACTED] then sent this text verbatim (including the typographical errors) to the [REDACTED]

v. On March 5, 2021, Arslanian texted [REDACTED] “Also please Don’t forget to speak to the [REDACTED] he thinks you did the 700. So please tell him that you did only 51 and that you wanna do the rest of the 650.” and “Bob asked me first thing if you did [REDACTED] please let me know if you did it and what they”. I believe, based on context, that “the 700” refers to 700 patients planned to be administered COVID-19 tests, and that the “51” refers to the patients who had already been tested.⁹⁵

w. On March 6, 2021, Arslanian texted [REDACTED], “Hi [REDACTED]. He walked in 10 minutes ago and the first thing he said to me is how many did you do in [REDACTED] and what did the mayor say about the police. ? I had no answer and he turned around and went to a meeting. I cannot believe what this is costing in terms of personal sacrifices. . . . I don’t know what the answer is I have not heard from anybody today.” I believe, based on the context and my participation in the investigation, that the “he” Arslanian is referring to is Menendez. [REDACTED] forwarded this text to [REDACTED], and responded to Arslanian, “Hi Nadine We take it 59 patients and the guy [REDACTED] call motaz and tell him He said take 23\$ each patient and [REDACTED] say no I can do this [REDACTED] say if you want to work with us you have to pay me 72k a year [REDACTED] say let think about it and I will give you a callback”.

⁹⁵ I know from public information that by this time, the federal government had passed legislation to provide billions of dollars in funding to pay for costs associated with COVID-19 tests.

x. On March 9, 2021, [REDACTED] texted Arslanian, "Good morning Nadine This church in [REDACTED] we start today 9:00am until 3:30 pm". Arslanian wrote, "Today?" and [REDACTED] responded, "Yes". Arslanian replied, "Bravo . I'm so happy"

y. On March 10, 2021, [REDACTED] texted Arslanian, "Hi Nadine We did [REDACTED] today, we did 11 patients today and 59 patients yesterday". Arslanian responded, "Thank you for letting me know. I am driving I will call you when I get home."

z. On March 12, 2021, [REDACTED] texted [REDACTED] "Elizabeth been calling since November 9 times last time was 3 days ago and the office manger for the mayor and she keeps blocking us so we never got the chance to talk to him . [REDACTED] same thing till finally I spoke to him and after that he never answered Union city we got one day a week and we did 2 weeks each time around 90-95 resident [REDACTED] keeps giving the run around since December till finally the mayor pushed him so hard and we got one remote church and we are there every day with a total number of people Swabed every day around 10-15 only [REDACTED] Counsil said ill do this and that and nothing till now also he referred us to [REDACTED] which I called him and as soon as introduced my self he said I am busy call me tomorrow. I called next day same thing I am busy and I don't have time call me after a week Spoke to [REDACTED]

and after a while I checked again as he requested he even texted and said I gave your information and it their call".⁹⁶ [REDACTED] then forwarded this message to Arslanian.⁹⁷

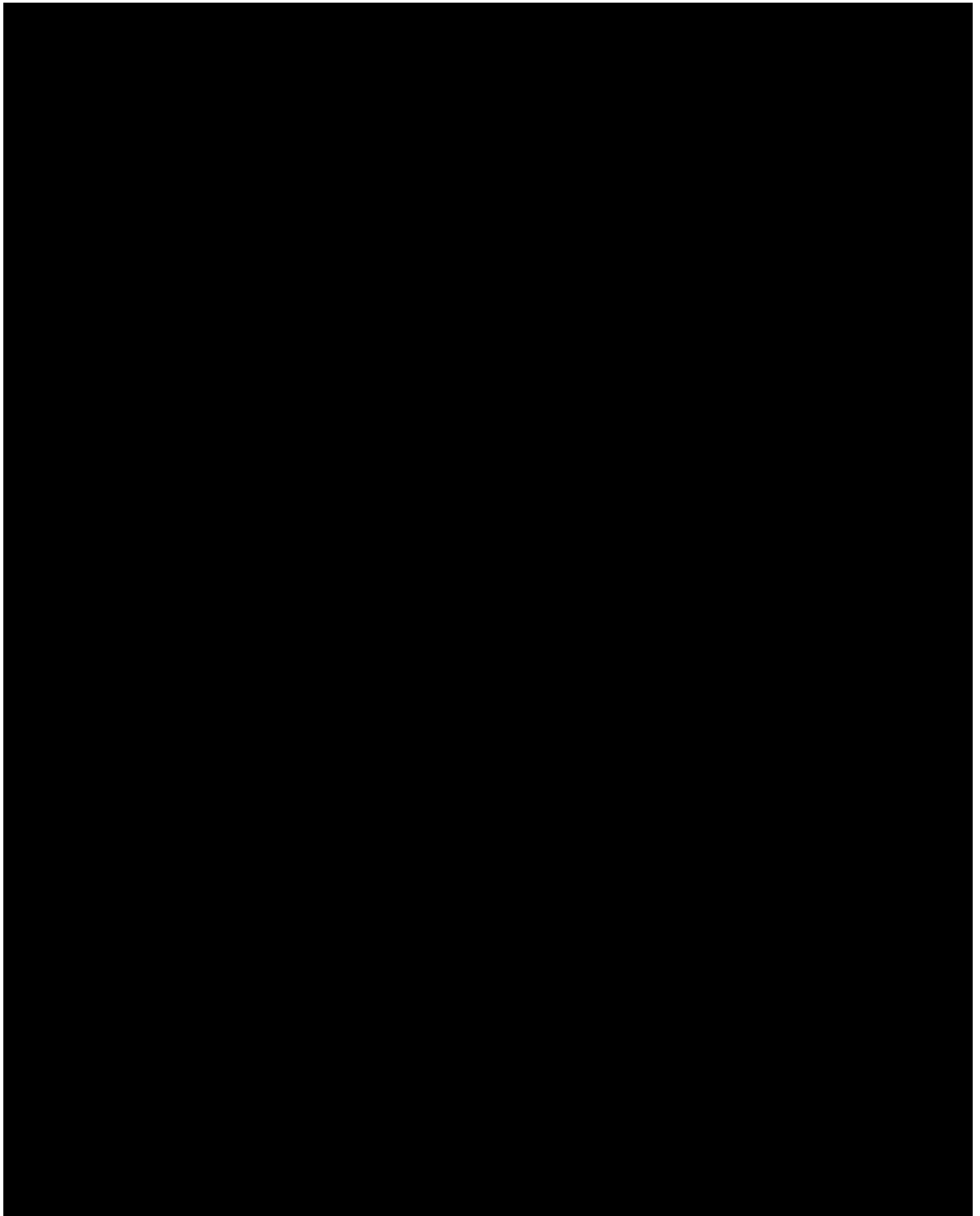
aa. On March 14, 2021, Arslanian texted [REDACTED] "I am so happy [REDACTED] came and he got to tell Bob himself about the different cities. Bob is so upset with the People working in the cities. I am so happy he got to talk to Bob himself". [REDACTED] responded, "Very good and thank you for letting [REDACTED] talk to him and tell him everything".

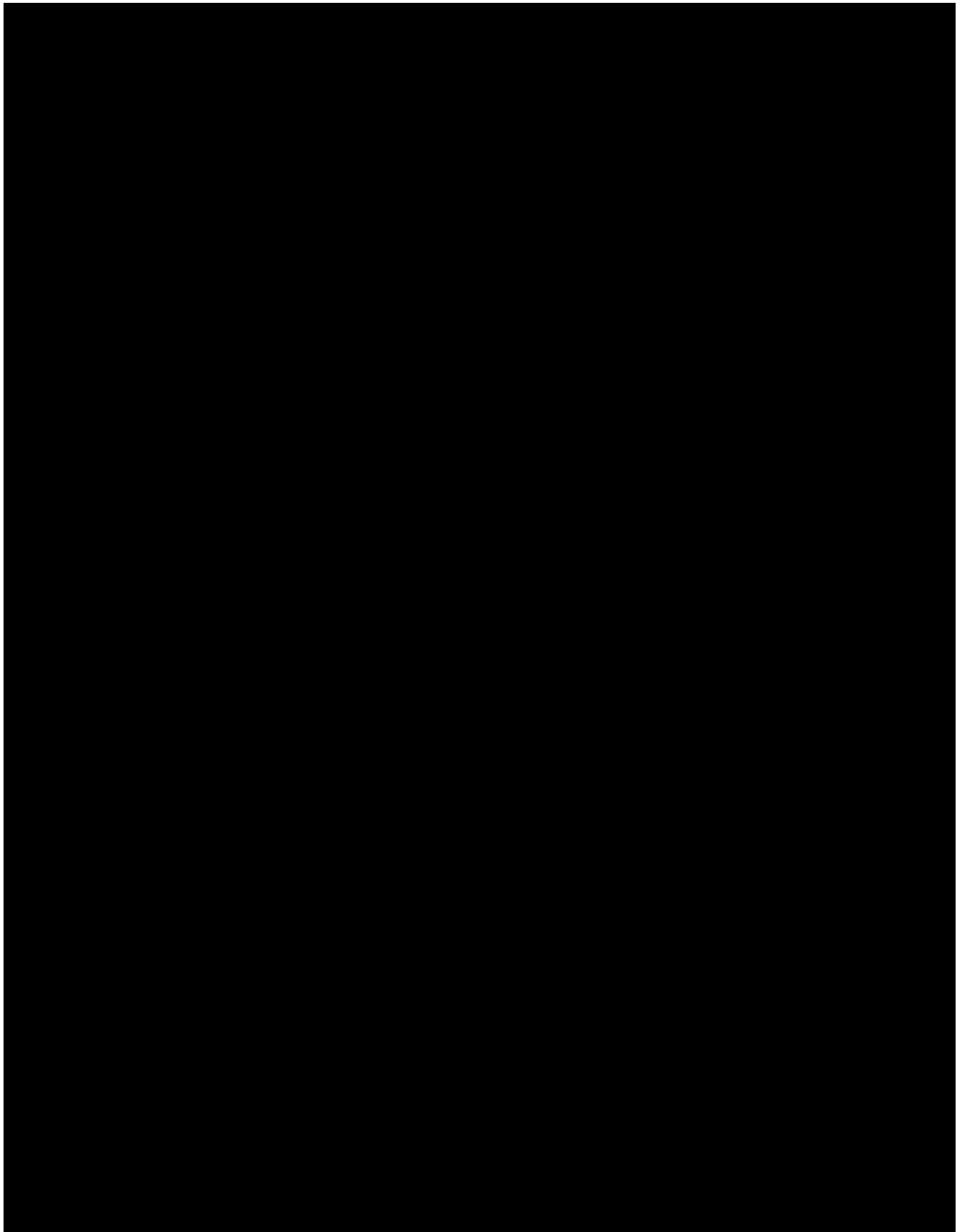
bb. On March 15, 2021, Arslanian texted [REDACTED], "You have three days in Union city this week."⁹⁸

⁹⁶ From speaking with other law enforcement personnel and reviewing an FBI report, I have learned that the [REDACTED] was interviewed on June 16, 2022, and stated, in substance and in part, that, although he coordinated the physical spaces where COVID-19 testing sites were located, companies that wanted to conduct COVID-19 testing were not required to go through the city, and could just come into [REDACTED] and start testing. He also stated that while the [REDACTED] recommended [REDACTED] and did not recommend any other testing companies, the [REDACTED] did not personally feel any pressure to use [REDACTED]. On August 24, 2022, the [REDACTED] was interviewed again and stated, in substance and in part, that the city's health officer (who was the [REDACTED]) had the authority to bar companies from conducting COVID-19 testing, but as a practical matter, during the relevant time periods, the [REDACTED] wanted more testing providers and was not turning testing providers away.

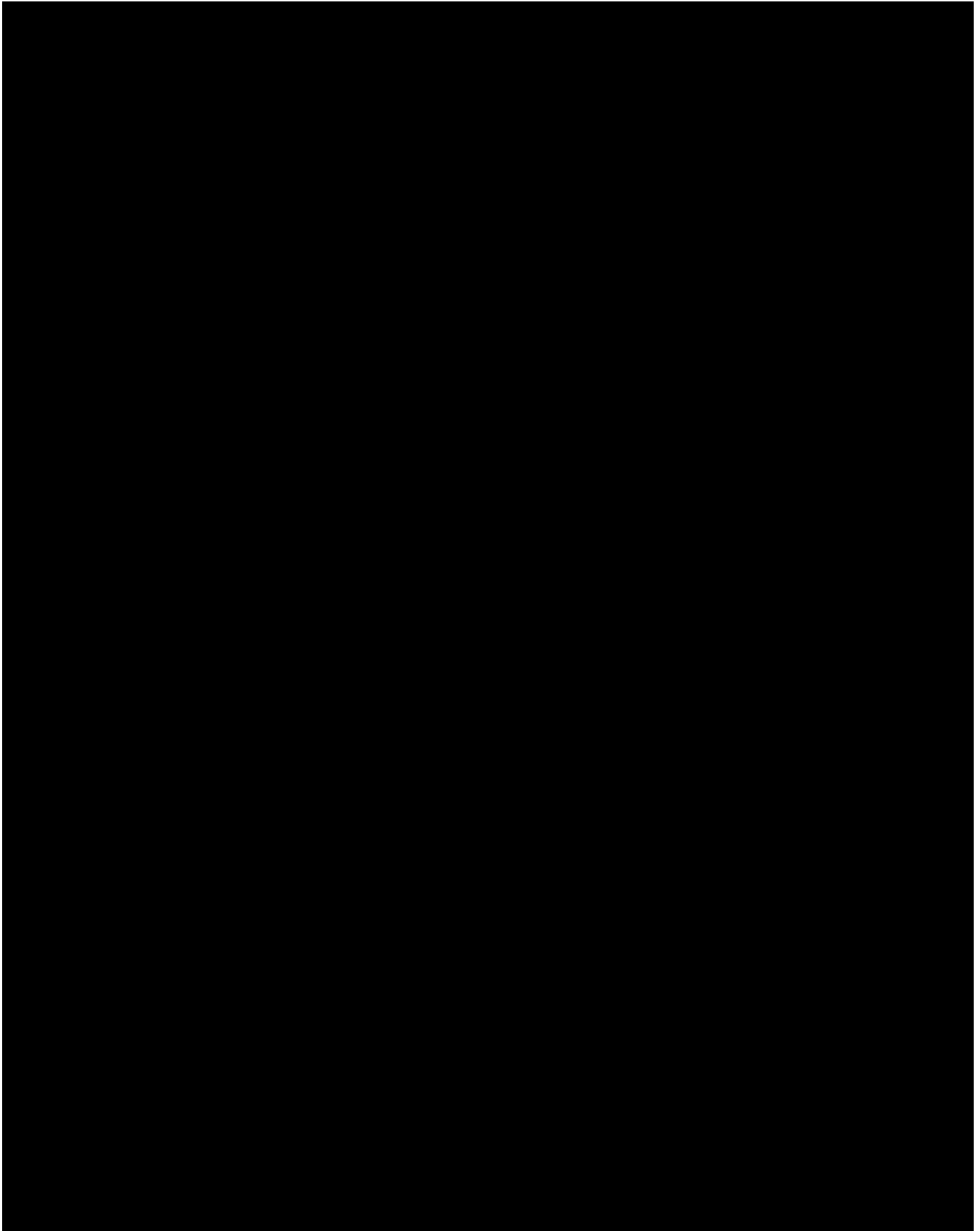
⁹⁷ Based on public information, I know that the [REDACTED] is a practicing lawyer, and appears to be the attorney whose contact information Arslanian provided to [REDACTED] as described in paragraph 62.j, above.

⁹⁸ Based on my conversations with law enforcement personnel and my review of interview notes and an FBI report, I have learned that (a) [REDACTED] was interviewed by FBI agents on June 16, 2022 and claimed that neither he nor [REDACTED] ever asked Menendez to help [REDACTED] that he asked Arslanian to help; and that Arslanian asked [REDACTED] to tell various officials that Menendez had sent them, and (b) [REDACTED] was interviewed by FBI agents on June 16, 2022 and denied that Menendez had made calls on [REDACTED] behalf.

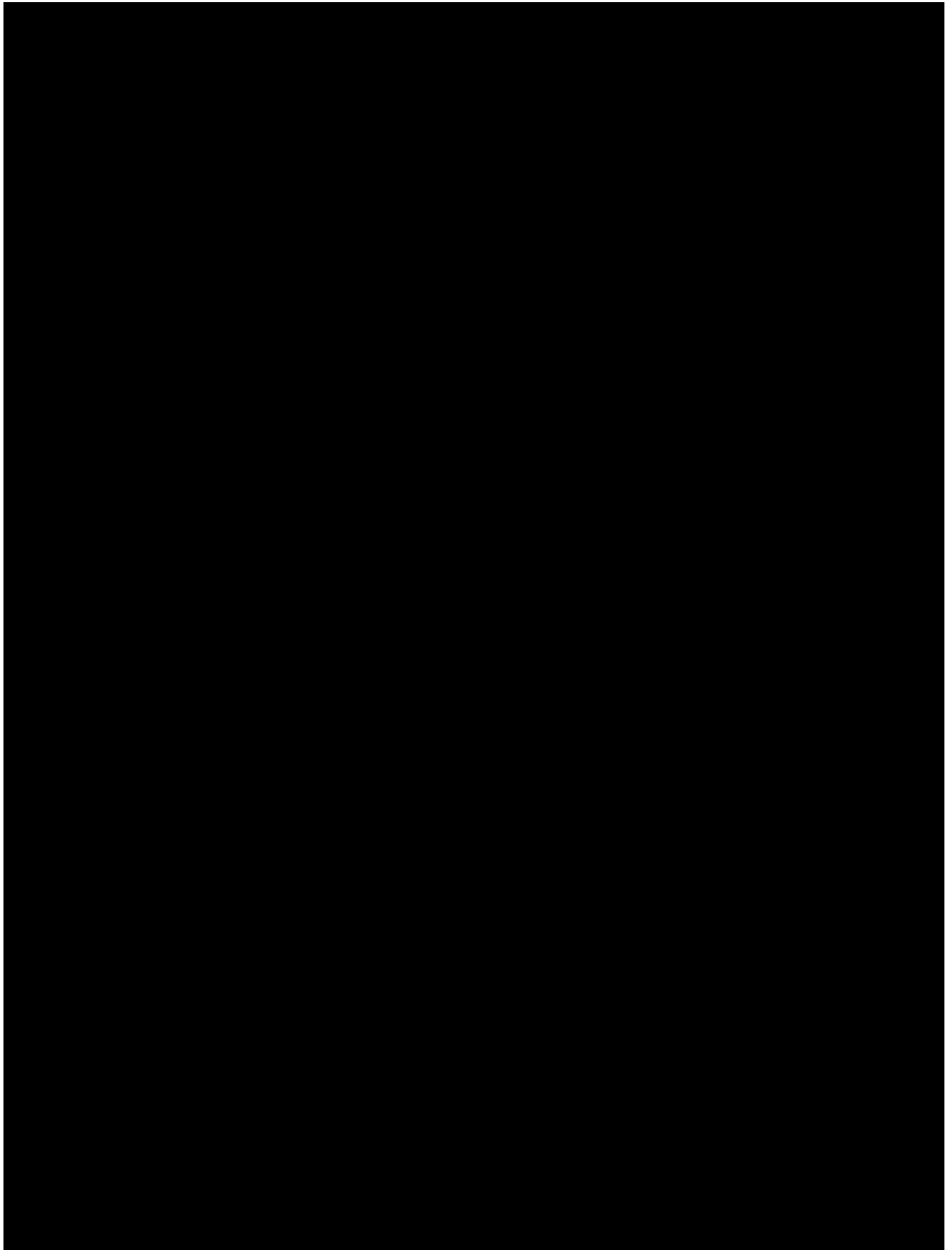




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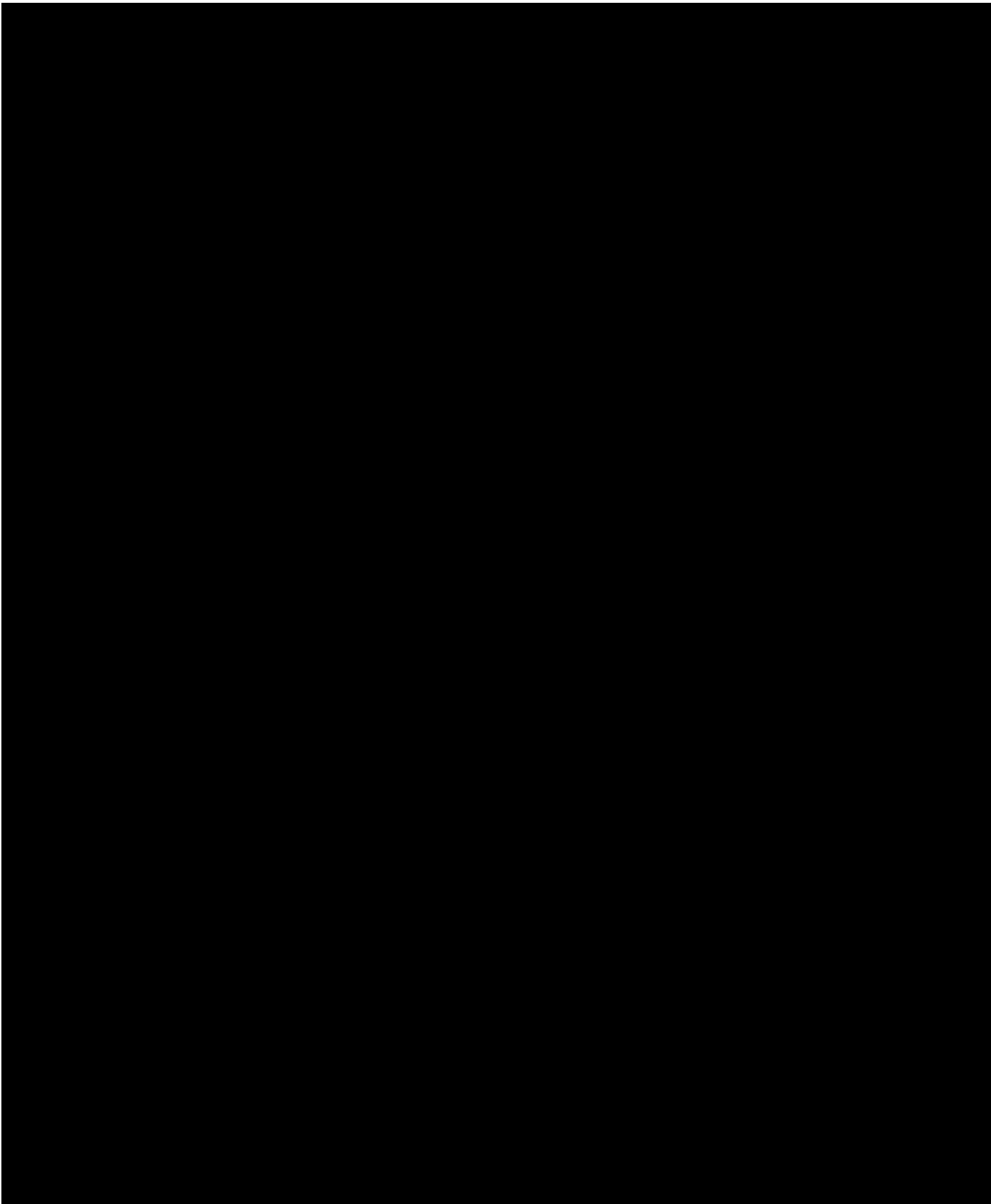


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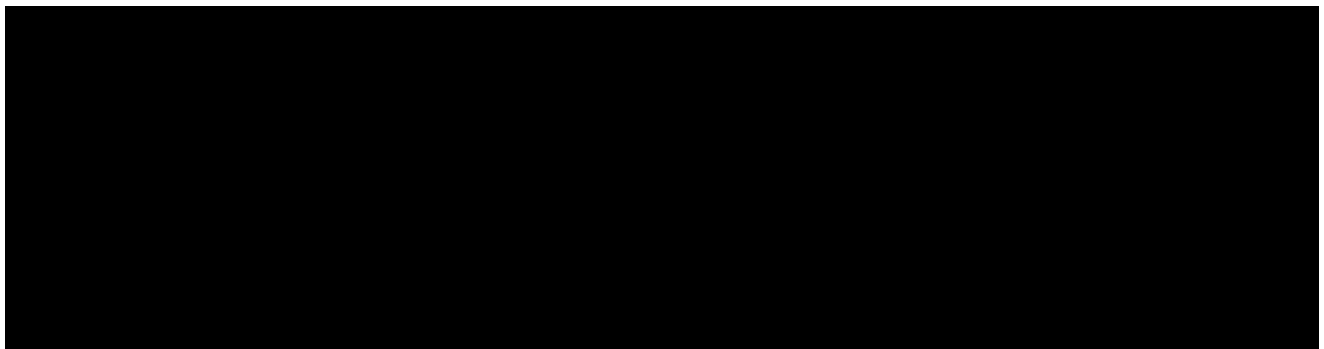


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69. As set forth below, I have learned that Hana sent Arslanian documents requesting assistance from Menendez with respect to two proceedings—a United States Department of Agriculture (“USDA”) investigation of the Hana Halal Company, and a personal injury lawsuit by a plaintiff seeking to access Egyptian assets. Specifically, based on my review of the contents of the Prior Hana Cellphone and the contents of the 2020 Arslanian Email Account-1 Media, the Hana Email Account-2 Media, and the Hana iCloud Account-1 Media, I have learned the following:

a. On or about May 13, 2019, a USDA employee stationed at the U.S. Embassy in Cairo (the “USDA Embassy Attaché”) sent an email to several other USDA employees as well as to several individuals with email addresses ending in usmef.org (the “USDA Email Message”), attaching a letter from the Hana Halal Company to the Egyptian Government. The USDA Embassy Attaché wrote: “See attached letter from [the Hana Halal Company] to the ministry, which makes the claim that ‘all companies have agreed to comply with Egyptian standard and regulation for halal.’ The letter is full of errors and appears to misrepresent facts. We received this via private channels. Can USMEF check with plants about these claims? Thanks”. From public information, I believe USMEF stands for the U.S. Meat Export Federation, a trade association that describes its mission as “to increase the value and profitability of the U.S. beef, pork and lamb industries by enhancing demand for their products in export markets through a dynamic partnership of all stakeholders.”

- i. Based on my review of documents obtained from USDA, I have learned that on or about May 1, 2019, the Hana Halal Company became the sole U.S. organization recognized by the Government of Egypt as authorized to certify halal compliance for exports from the United States into Egypt. Prior to this date, the Hana Halal Company apparently had no experience certifying halal compliance for exportation, and multiple other companies had performed those services in the United States.
- b. The day after the USDA Embassy Attaché sent the USDA Email Message, one of the recipients with a usmef.org email address forwarded it to an apparently private intermediary email address. At approximately 8:05 a.m. May 23, 2019, Hana, using Hana Email Account-2, forwarded the entire email chain to Arslanian.¹⁰³
- c. At approximately 8:07 a.m. on May 23, 2019—*i.e.*, approximately two minutes after Hana forwarded the USDA Email Message to Arslanian—Hana texted Arslanian, writing, “GM look up ur email and call me plz”. At approximately 8:25 a.m.—*i.e.*, several minutes later—Hana pasted the text of his email forwarding the USDA Email Message to Arslanian (including the original USDA Email Message) into a text message that he sent to Arslanian. About twenty minutes later, at approximately 8:44 a.m., Arslanian forwarded this message, via SMS message, to Menendez Email Account-2.¹⁰⁴

¹⁰³ The Prior Hana Cellphone data and the Hana iCloud Account-1 Media do not show the entire chain by which the USDA Email Message was transferred from the intermediary email address to Hana.

¹⁰⁴ I believe based on my training and experience and public information that it is possible to send SMS text messages directly to email accounts. Indeed, the Arslanian iCloud Account Media contents reflect that when Arslanian texted Menendez Email Account-2 several pictures on November 27, 2018, Arslanian explained, “I text you from my 516 cell phone to your email so it doesn’t bother you getting texts and interrupting your morning.” The May 23 text message referenced above could not be found among the contents of the Seized Arslanian Cellphone, and, therefore, I believe it was deleted sometime after the Government obtained the search warrant for the Arslanian iCloud Account.

d. Later on May 23, 2019, Hana from Hana Email Account-2 resent Arslanian the forwarded USDA Email Message as well as an email of real estate listing photographs for a home in New Jersey.

e. From talking to other law enforcement personnel, I know that on November 16, 2022, a former senior USDA official (the “Senior USDA Official”) was interviewed by members of the investigative team, and stated, in substance and relevant part, the following:

- i. In or about 2019, the USDA learned that the Government of Egypt withdrew its recognition from all halal certifying organizations in the United States except for the Hana Halal Company, which became the sole U.S. organization recognized by the Government of Egypt as authorized to certify halal compliance for exports into Egypt.
- ii. The USDA objected to this decision by the Government of Egypt, and took actions including the sending of a formal letter to the Government of Egypt expressing the view of the USDA disapproving of this decision.
- iii. Subsequently, Menendez called the Senior USDA Official’s cellphone and objected to the USDA’s alleged interference with the business of the Hana Halal Company.

f. At approximately 7:54 a.m. on June 3, 2019, Hana texted Arslanian images of an apparent legal demand letter (the “Demand Letter”) from an attorney representing an individual (the “Plaintiff”) seeking a \$13.5 million settlement in compensation for what her attorney described as “Egypt’s liability”.¹⁰⁵ From public information, I know that the Plaintiff publicly claimed that Egyptian armed forces injured her while she was traveling in Egypt and sought compensation from Egypt, and that there was significant congressional interest in the resolution of the case. The Demand Letter also stated, “Although we accept your representation that we are currently dealing with a private entity that is not the Government of Egypt, it’s not lost

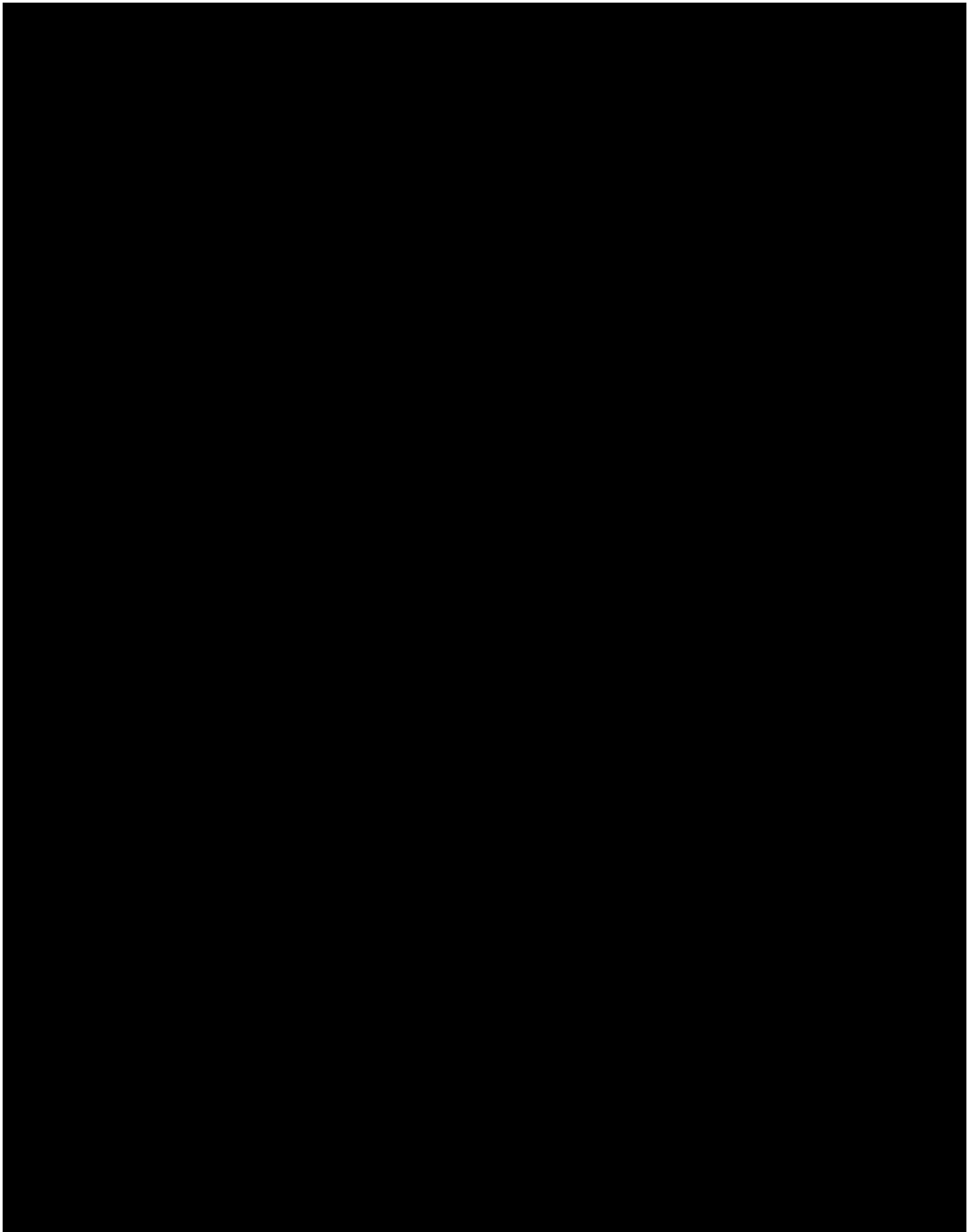
¹⁰⁵ I know from the contents of the Hana iCloud Account-1 Media that on or about May 30, 2019, an Egyptian official (referred to in paragraph 78.g, below, as Egyptian Official-3) had sent Hana images of the Demand Letter, which he subsequently forwarded to Arslanian.

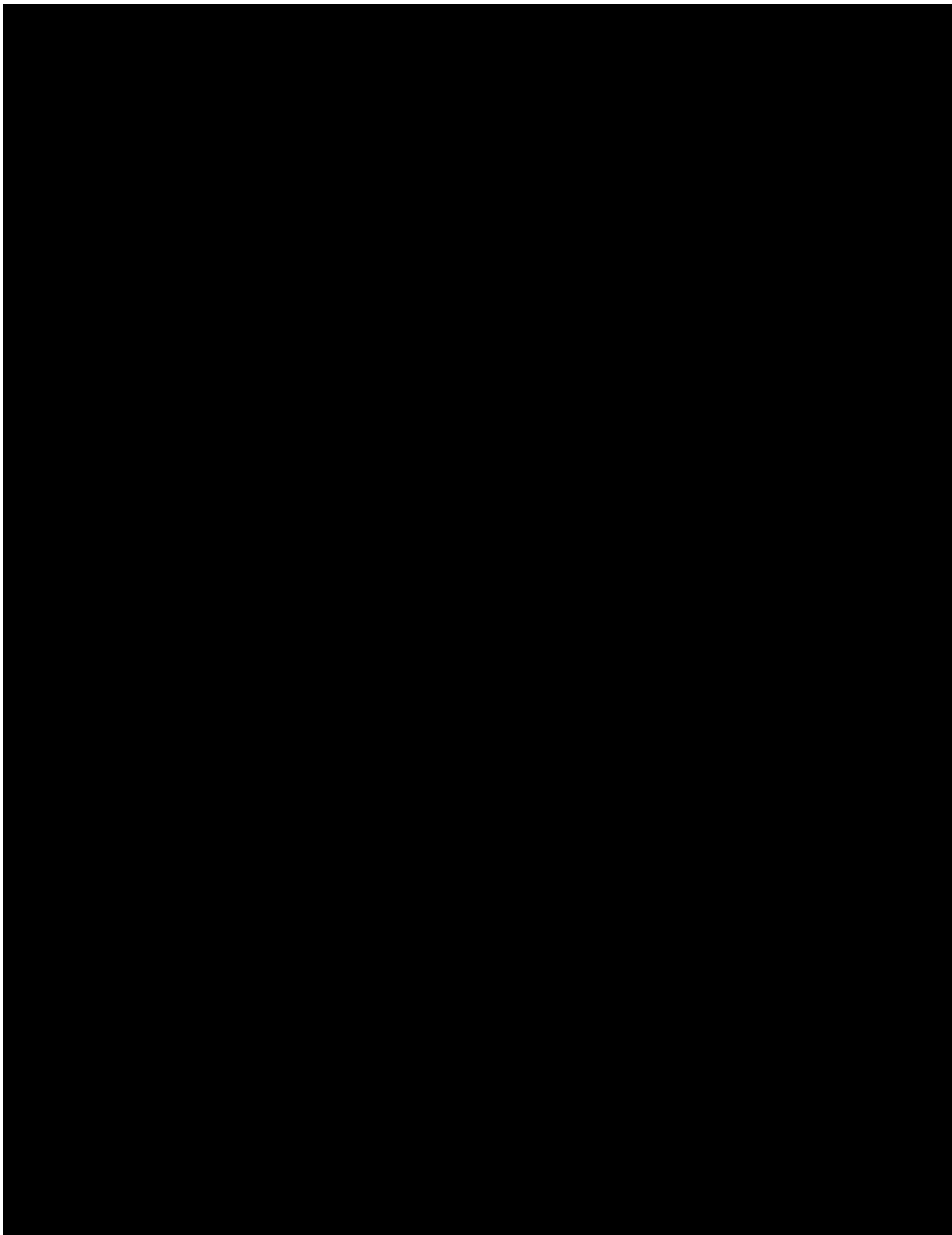
on anyone – whether [the Plaintiff], the Congress or the Administration – that this situation is Egypt’s liability alone. It’s also not lost on anyone that Egypt could easily supplement any amount offered by any party to ensure [the Plaintiff] is properly compensated and Egypt’s involvement would not need to be disclosed.” The Demand Letter further claimed that Congress was considering legislative action to withhold financial aid from Egypt if it did not achieve a fair and “commensurate” settlement with the Plaintiff.¹⁰⁶

g. At approximately 7:32 p.m. on June 3, 2019—*i.e.*, the same day Hana texted her images of the Demand Letter—Arslanian sent an SMS message to Menendez Email Account-1 attaching those images. At approximately 7:33 p.m. on June 3, 2019—*i.e.*, one minute later—Arslanian texted Hana, “I have been trying to call you all afternoon I have a question regarding the text you sent me I forwarded it. Call When you have a minute”.¹⁰⁷

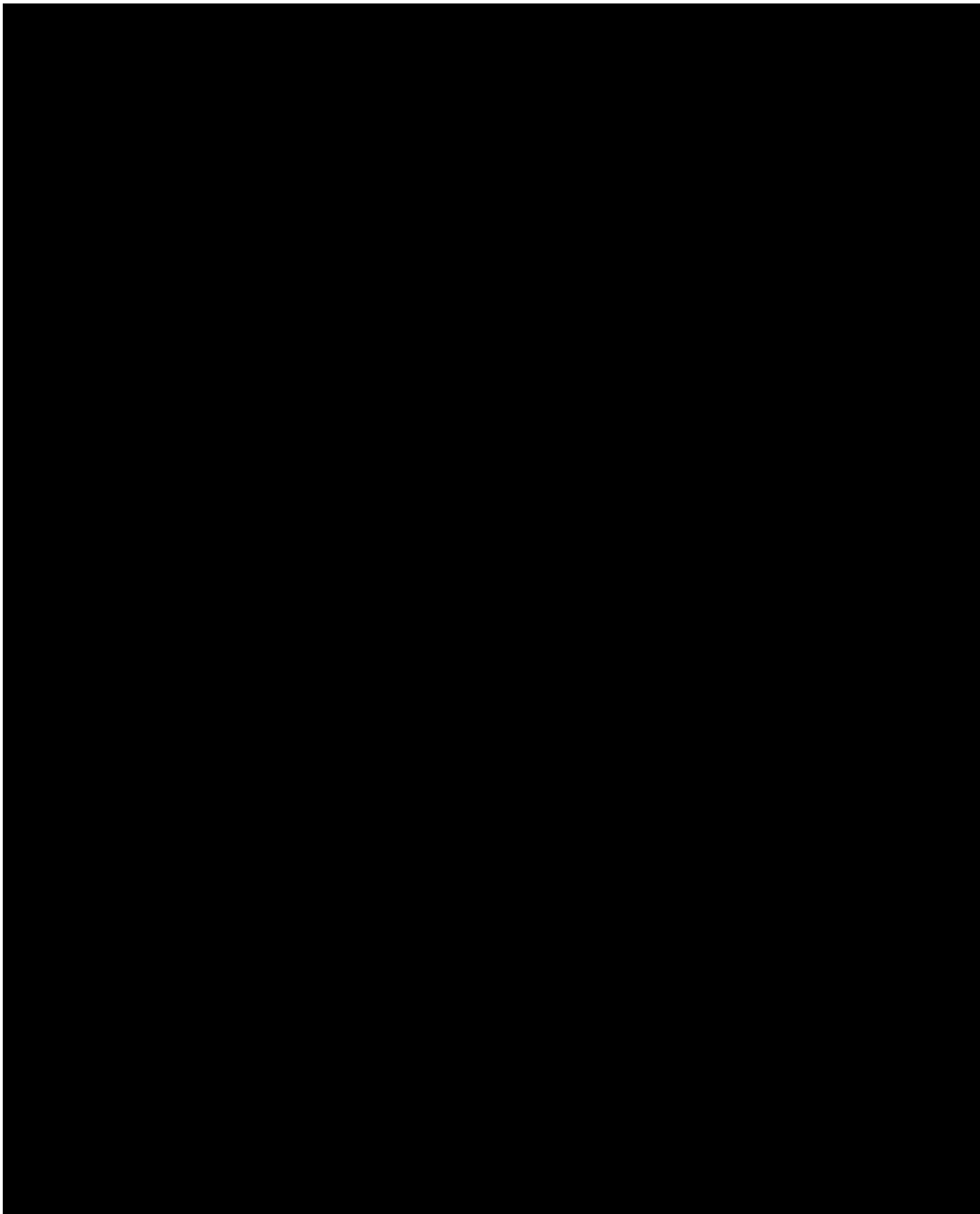
¹⁰⁶ From public information, I know that on March 29, 2019, approximately two months earlier, another U.S. Senator (“Senator-1” as described in paragraph 78.c, below) and another senior member of Congress wrote a letter to the U.S. Secretary of State requesting that he “inform Egyptian authorities that” the sale of Apache helicopters (and other lethal equipment) to Egypt for \$1 billion that had been approved on November 28, 2018 by the State Department, but had not yet been finalized, “not move forward until [Plaintiff’s] case is satisfactorily resolved.”, and stating, “To do otherwise would be seen as rewarding the Egyptian armed forces with more of the same lethal equipment that they used to recklessly injure an American tourist, despite the Egyptian government’s failure to provide her fair compensation.”

¹⁰⁷ I know from the contents of the Hana iCloud Account-1 Media that on or about May 10, 2018, Arslanian had sent Hana three images of text describing the statement Senator-1 that he would place a hold on up to \$300 million in aid to Egypt unless a series of conditions were met, including providing compensation for the Plaintiff.

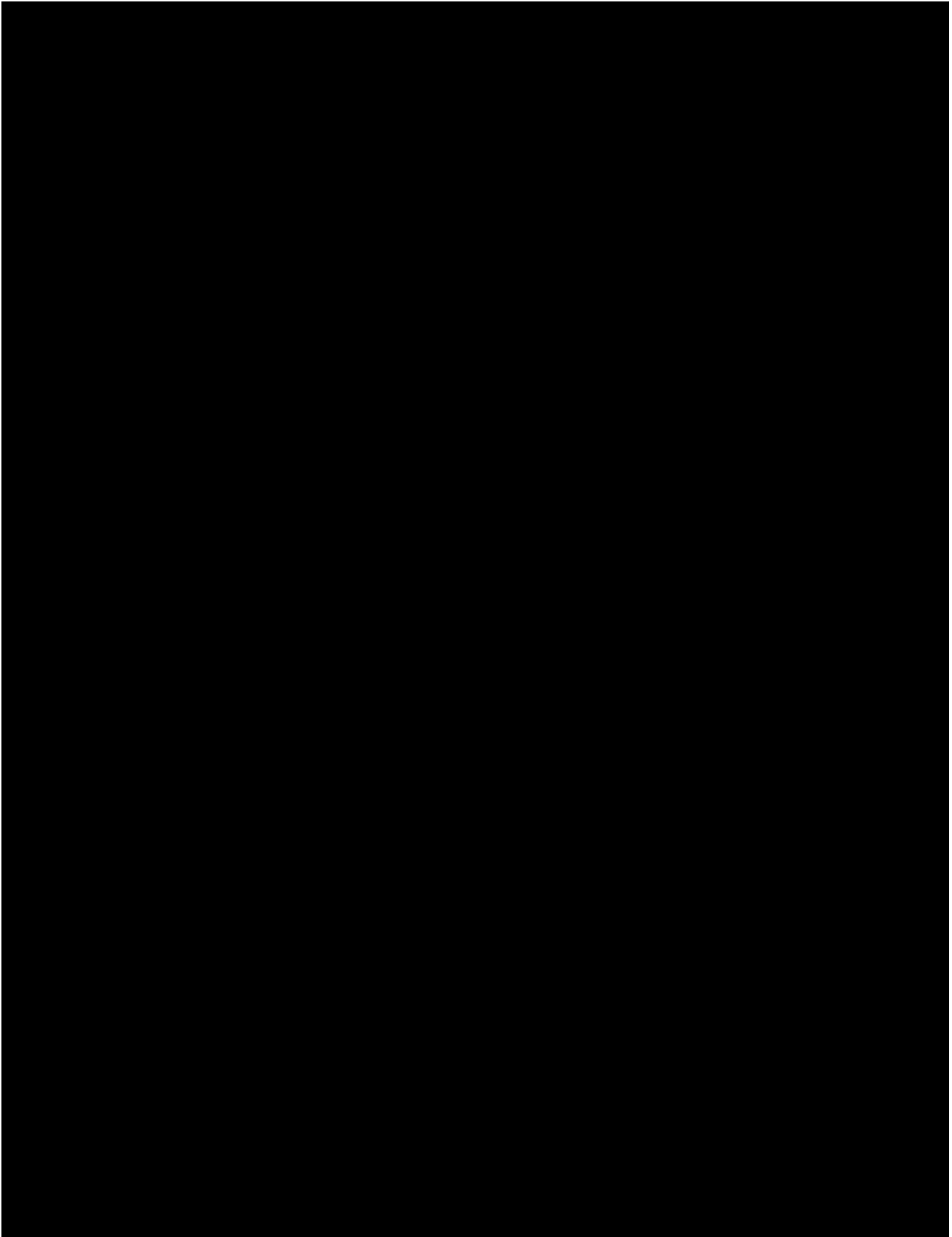




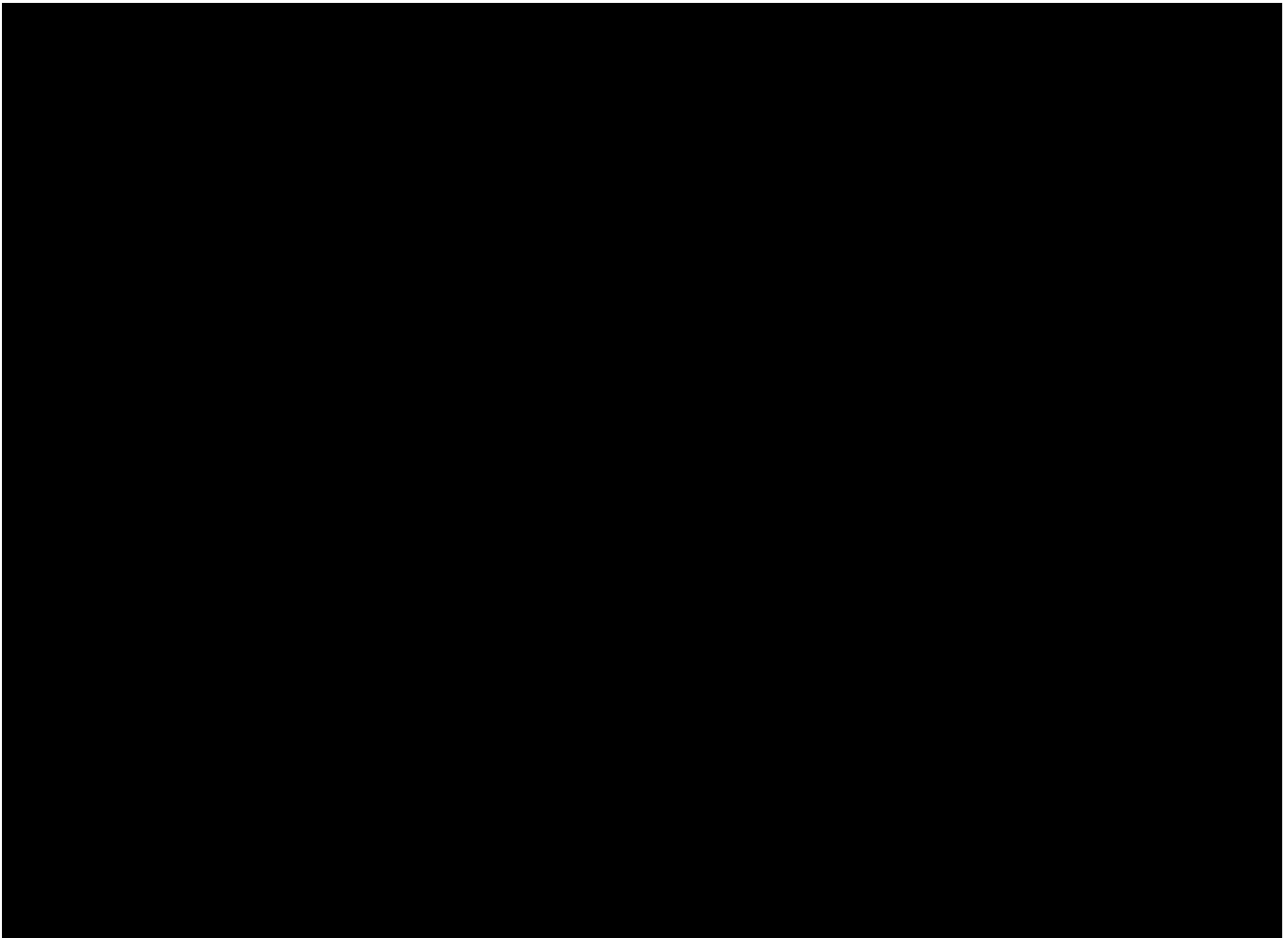
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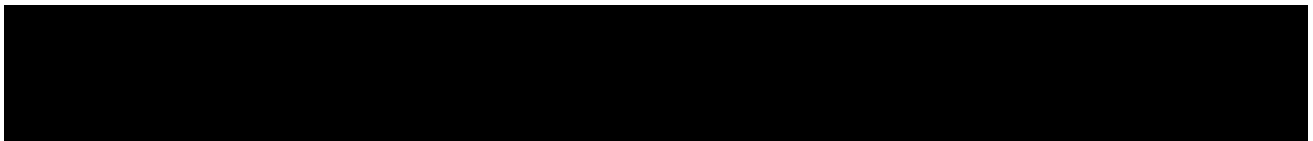
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78. Based on my review of the contents of the Prior Hana Cellphone, the 2020 Arslanian Email Account-1 Media, the Hana Email Account-2 Media, the Hana iCloud Account-1 Media, the Seized Prior Arslanian Cellphone, the Seized Arslanian Cellphone, the Seized Menendez Cellphone, and the Menendez Email Account-1 Media, I have learned that Hana, Arslanian, and Menendez discussed other meetings between Menendez and Egyptian government officials and matters concerning the relations between the United States and the Government of Egypt. For example:



a. Hana and Arslanian exchanged text messages regarding scheduling a meeting between Menendez, Hana, Arslanian, and several Egyptian officials in March of 2018.

b. On or about Sunday, May 6, 2018, Hana and Arslanian arranged a meeting between Hana, Arslanian, and Menendez at a restaurant. Later that day, a staff member for the SFRC (the “SFRC Staffer”) emailed a State Department employee (the “State Department Employee”), asking the State Department Employee how many Americans were posted to the U.S. Embassy in Cairo, and writing “Don’t ask why I’m asking...”. The State Department Employee responded, “I would have to ask and then someone is going to ask why”, and the SFRC Staffer replied, “Menendez is asking”. The next day, Menendez texted Arslanian, writing, “Just FYI. 277 Americans – combination of diplomats, commercial service, USAID, others[.] 1344 Egyptians, locally employed staff[.] This is what’s at American embassy. Most are Egyptians working at Embassy.” Arslanian then forwarded this text to Hana, who forwarded it to an Egyptian government official (“Egyptian Official-1”).¹¹¹

c. On or about May 7, 2018, *i.e.*, the day after the restaurant meeting described in paragraph 78.b, above, Menendez, using Menendez Email Account-1, sent Arslanian (at Arslanian Email Account-1), an email (the “Briefing Email”) titled “FYI” containing text from a news article reporting on objections that another U.S. Senator (“Senator-1”) was raising as the basis to withhold millions of dollars in U.S. military aid to Egypt. The Briefing Email also contained information—which I have been unable to find from contemporaneous public source reporting—regarding the amounts of aid withheld and the specific Congressional appropriations

¹¹¹ The contact number for Egyptian Official-1 is saved in the contacts in the Hana iCloud Account-1 Media & [REDACTED] based on my training and experience and participation in the investigation, I believe “Gen” is short for “General,” and “Eg” is short for “Egypt.” [REDACTED] is the first name of Egyptian Official-1.

from which the aid was being withheld as a result of actions by Senator-1. As summarized in the Briefing Email, the objections Senator-1 was relying on included multiple objections based on Egypt's human rights record, including the pending personal injury lawsuit of the Plaintiff. Arslanian took a series of screenshots of the Briefing Email (which screenshots included all of the Briefing Email's content but did not identify the sender of the email) and sent them to Hana.

d. On or about May 14, 2018, Hana (using the Hana Email Account-2) sent Arslanian (at Arslanian Email Account-1) an email containing a numbered set of talking points (the "Talking Points") responsive to Senator-1's objections contained in the Briefing Email. Arslanian (using Arslanian Email Account-1) forwarded the Talking Points to Menendez (at Menendez Email Account-1) that day.¹¹²

e. On or about May 28, 2018, Arslanian (using Arslanian Email Account-1) re-forwarded the Talking Points to Menendez (at Menendez Email Account-1), writing, "Love of my life , PLEASE, could you fix this letter and send it back to me. I want to prove a point to the General. He and Will just got me clearance for a project". This email was not found in the 2020 Arslanian Email Account-1 Media or the Menendez Email Account-1 Media and was only found in the Seized Prior Arslanian Cellphone.¹¹³ Later that day, Menendez (using Menendez Email Account-1) wrote an email to Arslanian (at Arslanian Email Account-1) with the subject line

¹¹² The portion I have been able to find of Arslanian's email forwarding the Talking Points to Menendez contains only the initial portions of the email, and thus does not include the full body of the Talking Points.

¹¹³ As with the May 14 email as discussed in footnote 112, the portion I have been able to find contains only the initial portions of the email, and thus does not include the full body of the Talking Points. However, as described below, Menendez then adapted the Talking Points into a letter, including portions of the Talking Points that were not contained in the portion of this email that I have been able to find. Accordingly, I believe based on my training and experience that Menendez received the entire May 28, 2018 email from Arslanian and I have only been able to recover the initial portions of that email because of the deletion of that email by Arslanian and Menendez.

“Letter.” This email consisted of the body of a letter (the “Menendez Ghostwritten Letter”) with no addressee or author information containing the substance of the Talking Points and adapted into a polished letter. The Menendez Ghostwritten Letter began “I write to respond to some of the issues that have been raised by [Senator-1] and others, which have lead [sic] to a hold on \$300 million dollars in appropriated aid to Egypt.” Arslanian then forwarded the Menendez Ghostwritten Letter (altered to preserve its substance but conceal the fact that it originated from a Menendez email account) to Hana.

f. On or about May 18, 2018, Menendez and Hana met for dinner at a restaurant in New Jersey. That evening, Hana texted an Egyptian government official who had met with Menendez in the March 13, 2018 meeting (“Egyptian Official-2”), writing, “The ban on small arms and ammunition to Egypt has been lifted. That means sales can begin. That will include sniper rifles among other articles”.¹¹⁴ Based upon documents provided by a lobbying firm, Egyptian Official-2 then emailed two lobbyists who served as registered agents of Egypt during that time period (the “Lobbyists”), writing “I was just told privately now that ban small arms on egypt was left today” and asking them to confirm this fact but “Pls keep it private”. One of the Lobbyists then emailed the SFRC Staffer, saying that someone in Menendez’s office just told Egyptian Official-2 that the small arms ban was lifted and asking her if she could confirm it. The SFRC Staffer then responded, confirming the fact and remarking, “Hmmm. It wasn’t me, and I’m the only one who would have known at the staff level”.

¹¹⁴ Egyptian Official-2 was identified in, among other things, text messages between the Seized Arslanian Cellphone and the Seized Menendez Cellphone, as an Egyptian military official.

g. On or about July 9, 2018, an Egyptian government official (“Egyptian Official-3”)¹¹⁵ messaged Hana screenshots of a letter (the “Egyptian Ghostwritten Letter”) that was in substance highly similar, and in parts near verbatim to the Menendez Ghostwritten Letter (including preservation of an arguable typographical error) but was addressed to another U.S. Senator who was Chairman of the SFRC (“Senator-2”) and contained a signature block attributing the Egyptian Ghostwritten Letter to a committee in the Egyptian government.¹¹⁶

h. Hana and Arslanian exchanged text messages regarding scheduling a meeting between Menendez, Hana, Arslanian, Andy Aslanian, and several Egyptian officials on July 25, 2018.

i. On July 26, 2018—*i.e.*, the day after the scheduled meeting with Egyptian officials described in paragraph 78.b, above—Arslanian texted Hana, “I am going to sign off this sale to Egypt today. Egypt: 46,000 120MM Target Practice Rounds and 10,000 Rounds Tank Ammunition: \$99 million NOTE: These tank rounds are for tanks they have had for many years. They are using these in the Sinai for the counter-terrorism campaign.” Based on the context and on a message between Arslanian and Menendez, I believe that this text represented Arslanian forwarding Menendez’s words to Hana. Later that day, Hana forwarded that text to an Egyptian official (“Egyptian Official-2”),¹¹⁷ who replied with a thumbs-up emoji.¹¹⁸

¹¹⁵ Egyptian Official-3 is listed in the contacts of the Seized Arslanian Cellphone as [REDACTED]

¹¹⁶ I have not yet been able to determine if a version of the Egyptian Ghostwritten Letter was received by Senator-2 or the SFRC.

¹¹⁷ This individual was among those Egyptian officials referred to in the Arslanian iCloud Account as attending the March and June 2018 meetings referred to in paragraphs 78.a and 78.b, above.

¹¹⁸ Based on my review of public information, I have learned that on or about September 18, 2018, the State Department made a determination approving a possible Foreign Military Sale to Egypt of forty-six thousand (46,000) M831A1 and M865 rounds and ten thousand (10,000) APFSDS-T rounds for an estimated cost of \$99 million, which corresponds to the amount of munitions and

j. As set forth in paragraph 62.d.i, above, Arslanian and Hana exchanged text messages regarding planned meetings involving Menendez, Hana, and Egyptian officials in April 2019.

k. On or about May 21, 2019, Menendez, Hana, and Arslanian attended a meeting in Menendez's office in Washington, D.C. with Egyptian Official-3. During the course of that meeting, Hana discussed matters related to the Hana Halal Company. During or shortly after the meeting, Menendez performed a Google search for the name of the Plaintiff using Menendez Email Account-2, which is a Google account. That meeting was not memorialized on the calendar maintained by Menendez's staff. That evening, Menendez, Arslanian, Hana, [REDACTED] and Egyptian Official-3 attended a dinner in Washington, D.C. From reviewing law enforcement reports, I know that FBI agents conducting surveillance of that dinner overheard Arslanian say, in substance, "What else can the love of my life do for you?"

l. Text messages between Arslanian and an Egyptian official ("Egyptian Official-4") reflected that in or about June 21, 2021, Menendez met privately for dinner with the [REDACTED] in advance of a June 22, 2021 meeting between [REDACTED] and members of the SFRC.¹¹⁹ On the evening of June 21, 2021, Menendez sent Arslanian a news article (the "Article") reporting that some U.S. Senators were planning, at the June 22, 2021 meeting, to ask the [REDACTED] about recent reports that the Egyptian government had assisted the Saudi Arabian government in a high-profile and controversial assassination of a Saudi dissident and journalist. Arslanian sent the Article to

estimated contract amount discussed in the sale that was signed off (apparently by Menendez) in the text messages that Arslanian had sent to Hana, and Hana had then forwarded to an Egyptian official approximately two months earlier, as described in paragraph 78.i.

¹¹⁹ Egyptian Official-4 referred in a text message to Arslanian to the [REDACTED] as "my director."

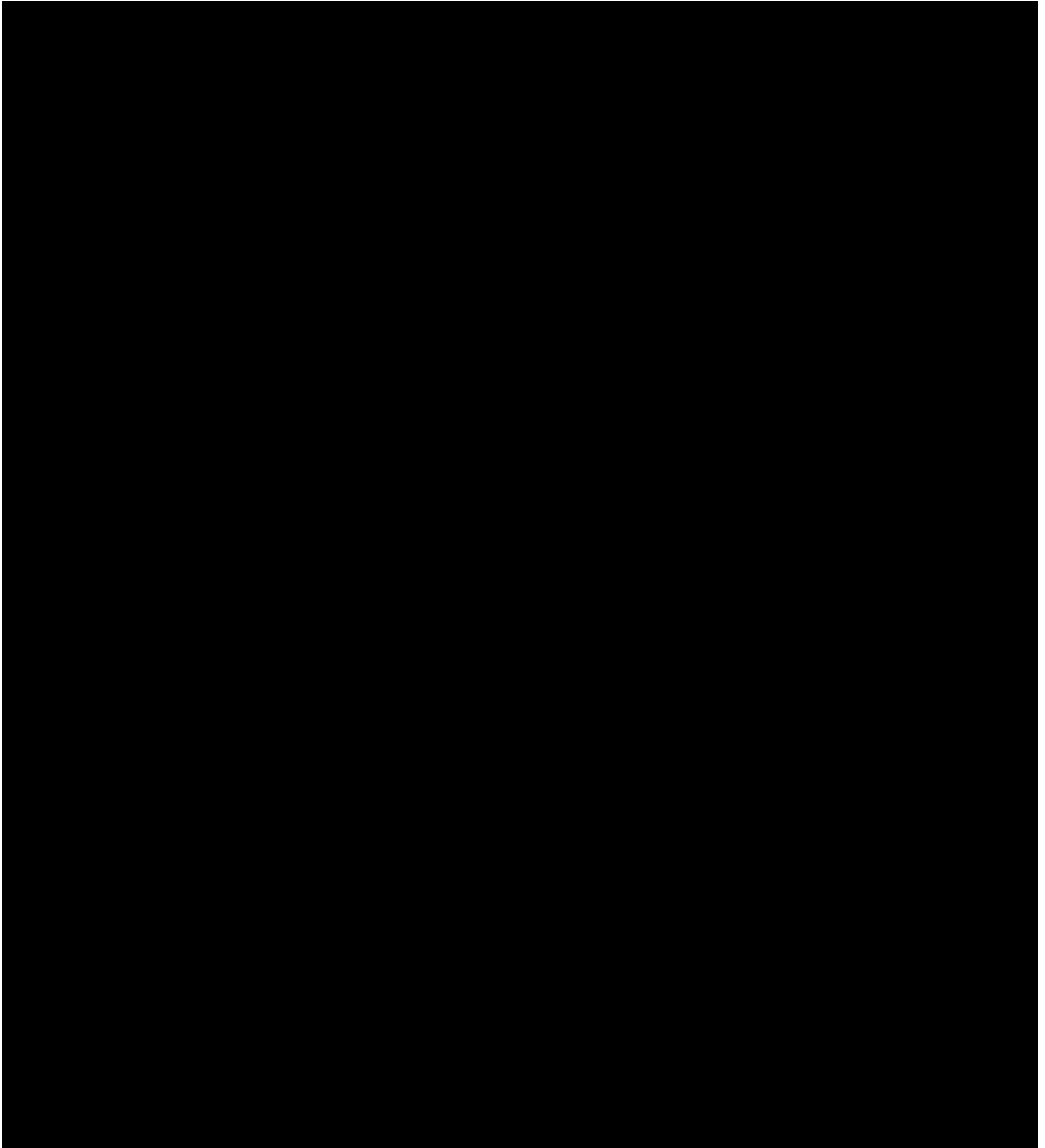
Egyptian Official-4 on the evening of June 21, 2021, and Egyptian Official-4 responded, “Thanks you so much, chairman also raised it today, we appreciate it”. Based on my training and experience and participation in the investigation, I believe the reference to “chairman” referred to Menendez, who was at the time the Chairman of the SFRC. The evening of June 22, 2021, after the meeting between the EGIS Director and the SFRC members, Arslanian texted Egyptian Official-4, writing, “I truly hope the information that I sent you last night was helpful. , I just thought it would be better to know ahead of time what is being talked about and this way you can prepare your rebuttals.”

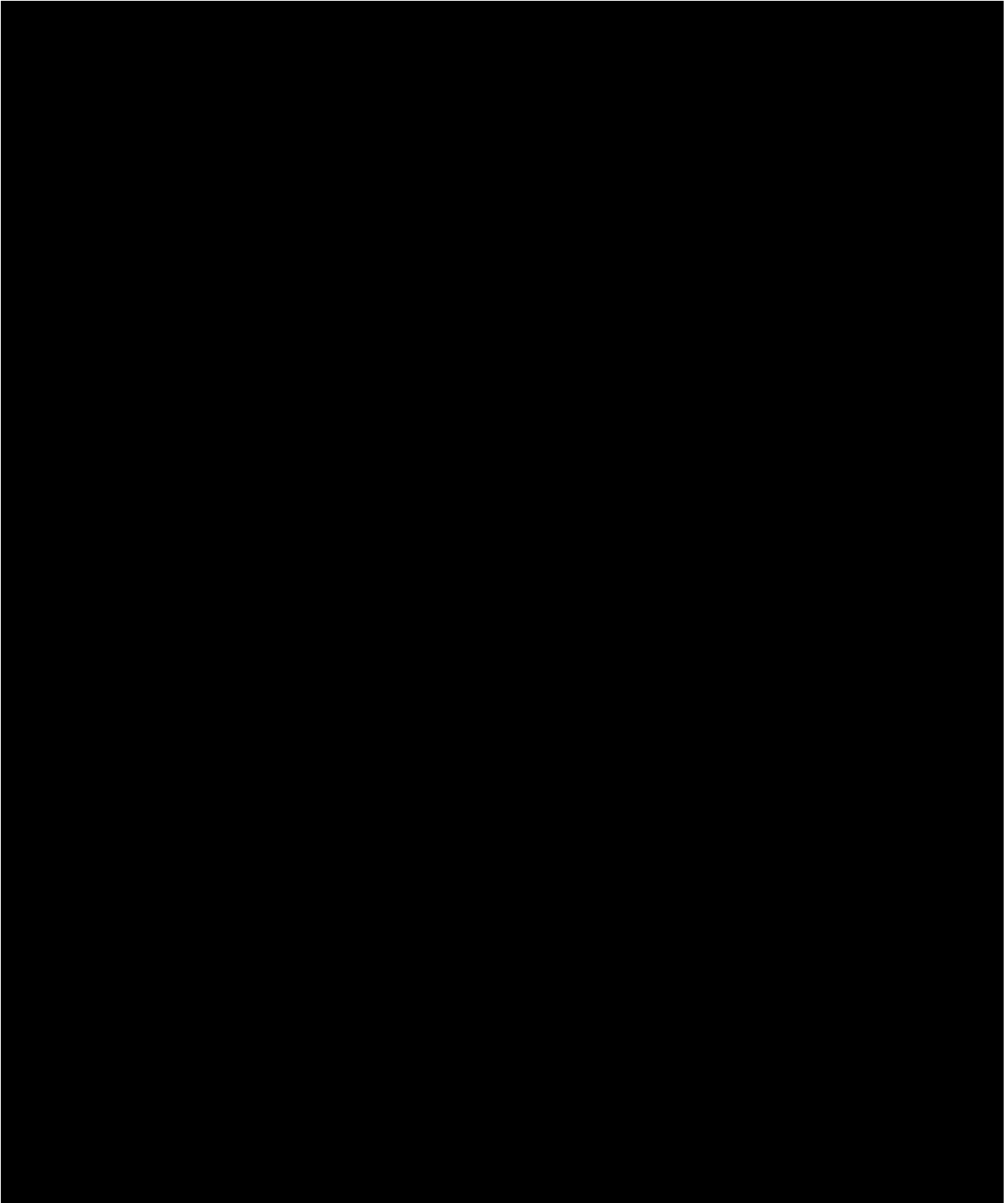
m. Based on documents obtained by grand jury subpoena, on June 23, 2021, *i.e.*, the day after the meeting between the [REDACTED] and the SFRC members, Hana bought a group of one-ounce gold bars marked with serial numbers. As noted below, a June 16, 2022 search of Menendez and Arslanian’s residence and the Seized Arslanian Cellphone pursuant to the First D.N.J. Search Warrants revealed that two gold bars with serial numbers indicating they were likely purchased by Hana on June 23, 2021 were found in Menendez and Arslanian’s residence, and five more gold bars with serial numbers indicating they were likely purchased by Hana on June 23, 2021 were found pictured on the Seized Arslanian Cellphone.

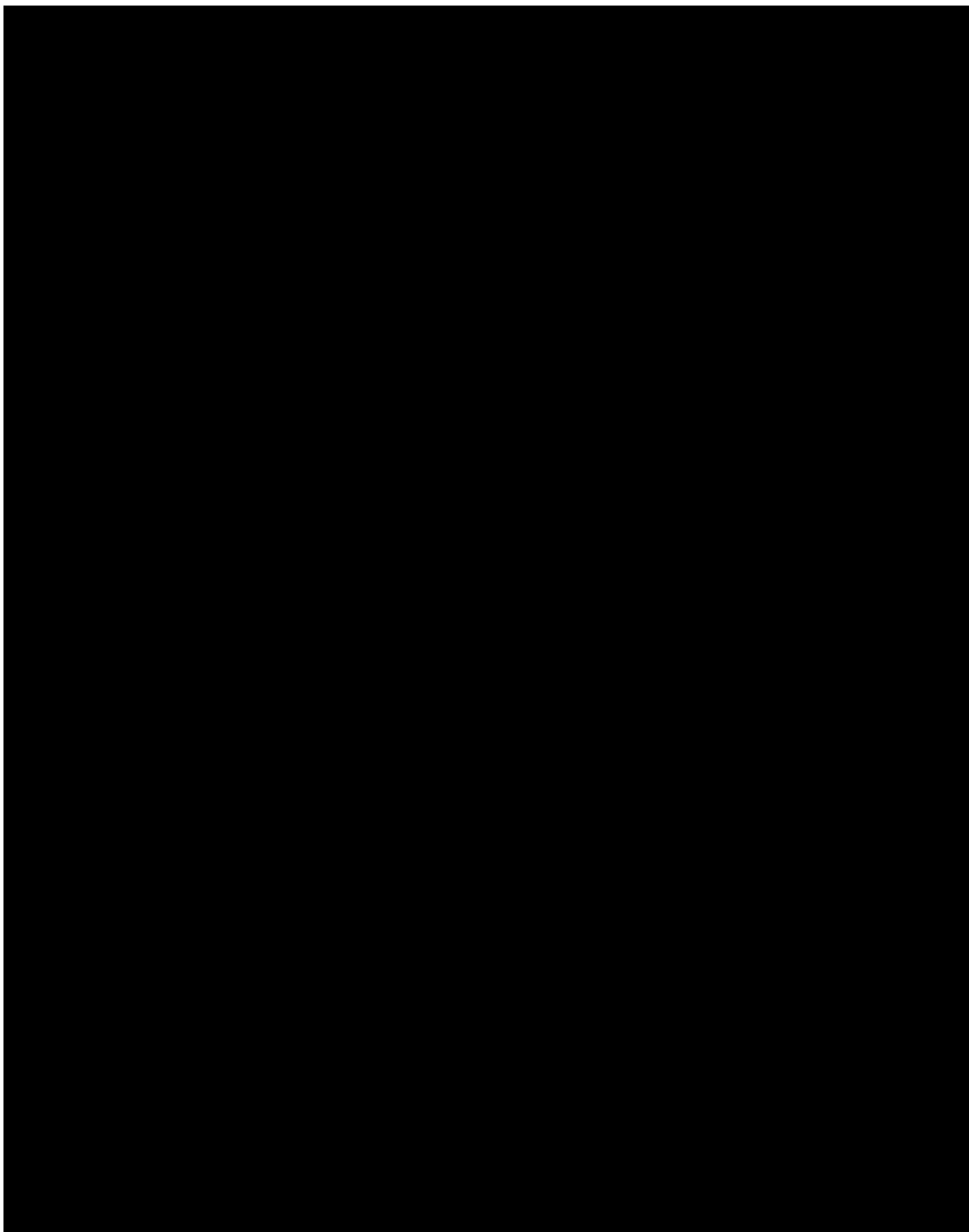
n. On or about January 28, 2022, Menendez texted Arslanian a link to a news article regarding the approval by the Biden administration of over \$2 billion in foreign military sales to Egypt. Later that day, Arslanian messaged Hana, writing “Bob had to sign off on this” and texted Hana the link to this article.

o. I have been informed by other law enforcement personnel that as of in or about September 2023, Hana and Arslanian had not notified the Attorney General of any activities

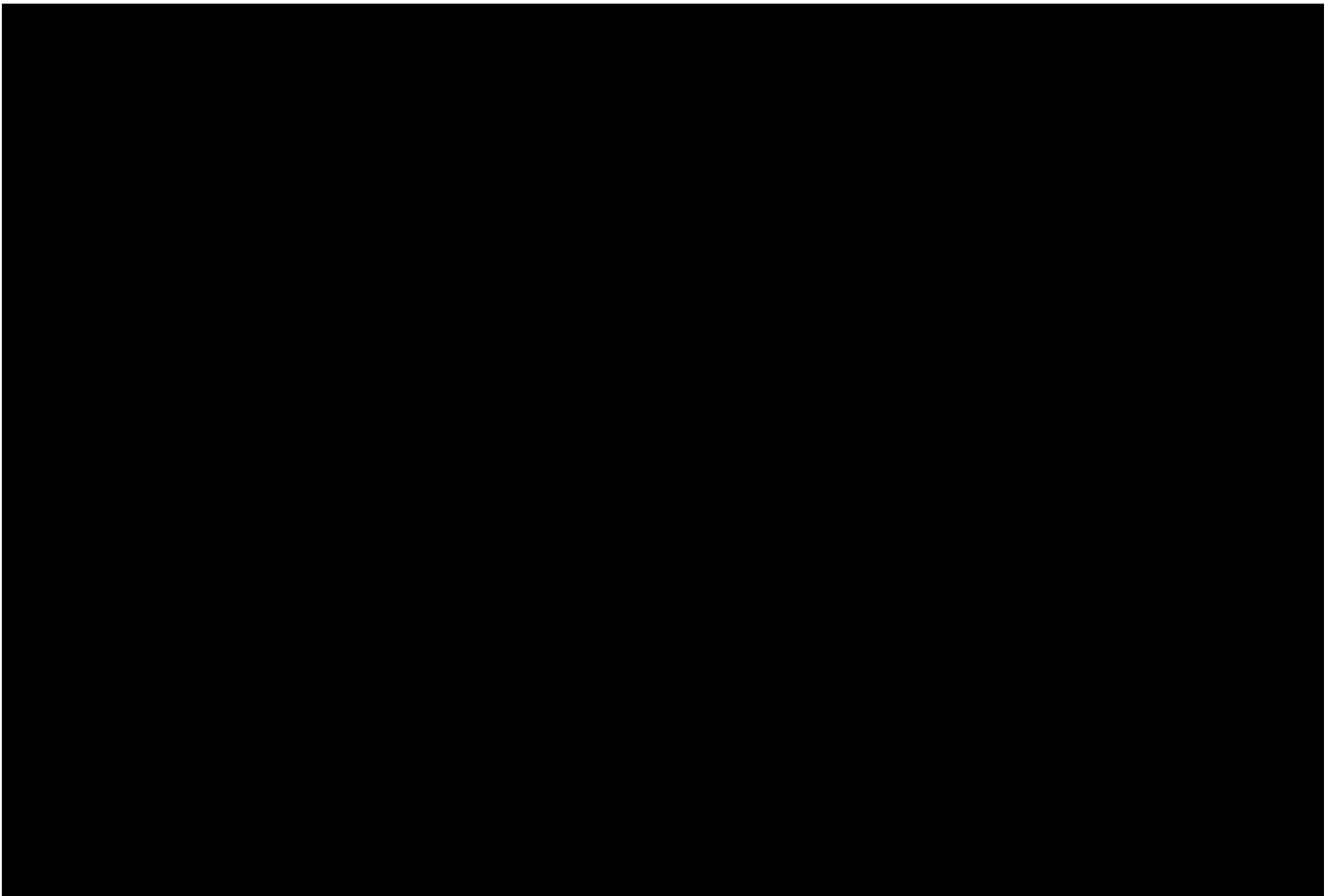
on behalf of the Egyptian Government in the United States pursuant to 18 U.S.C. § 951 nor had they registered as agents of the Egyptian Government under FARA.



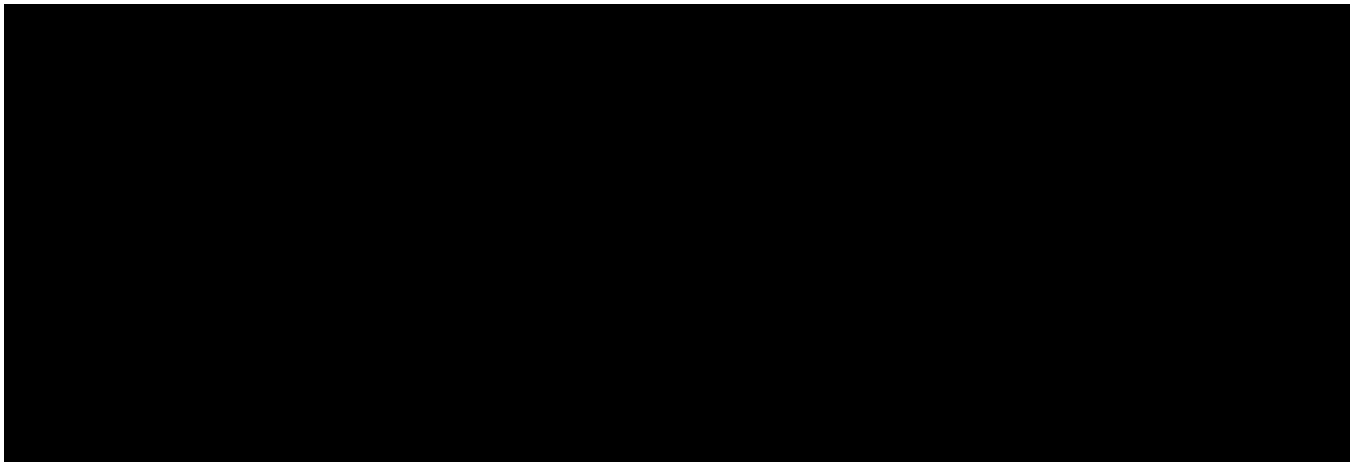
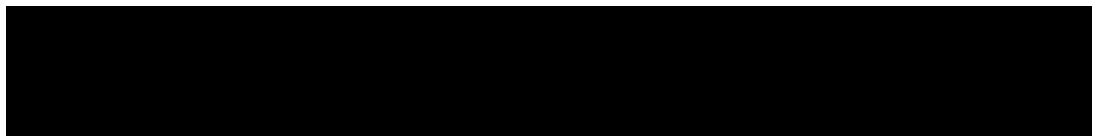


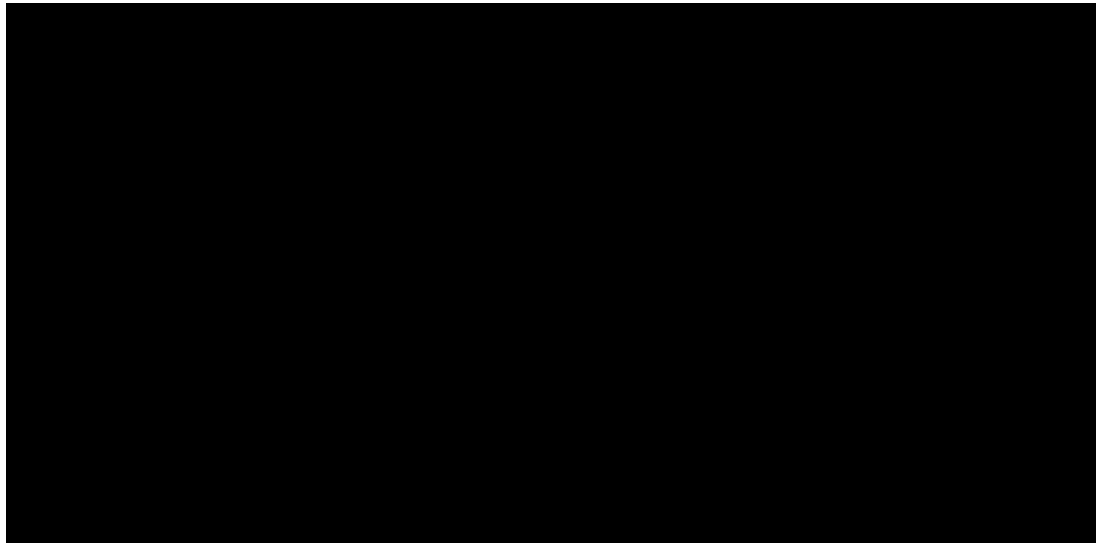


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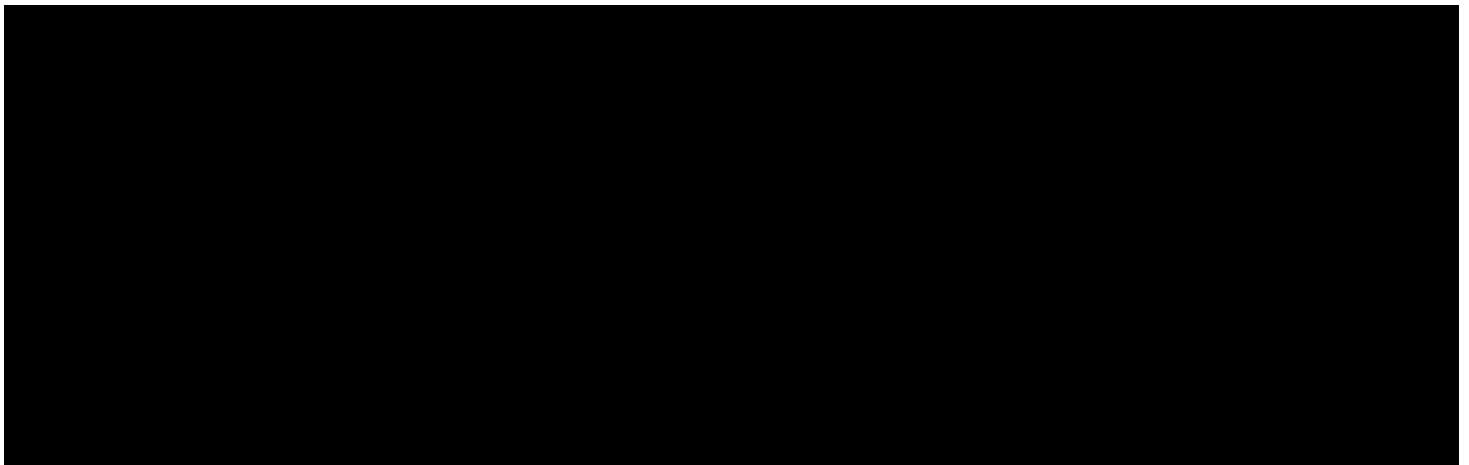


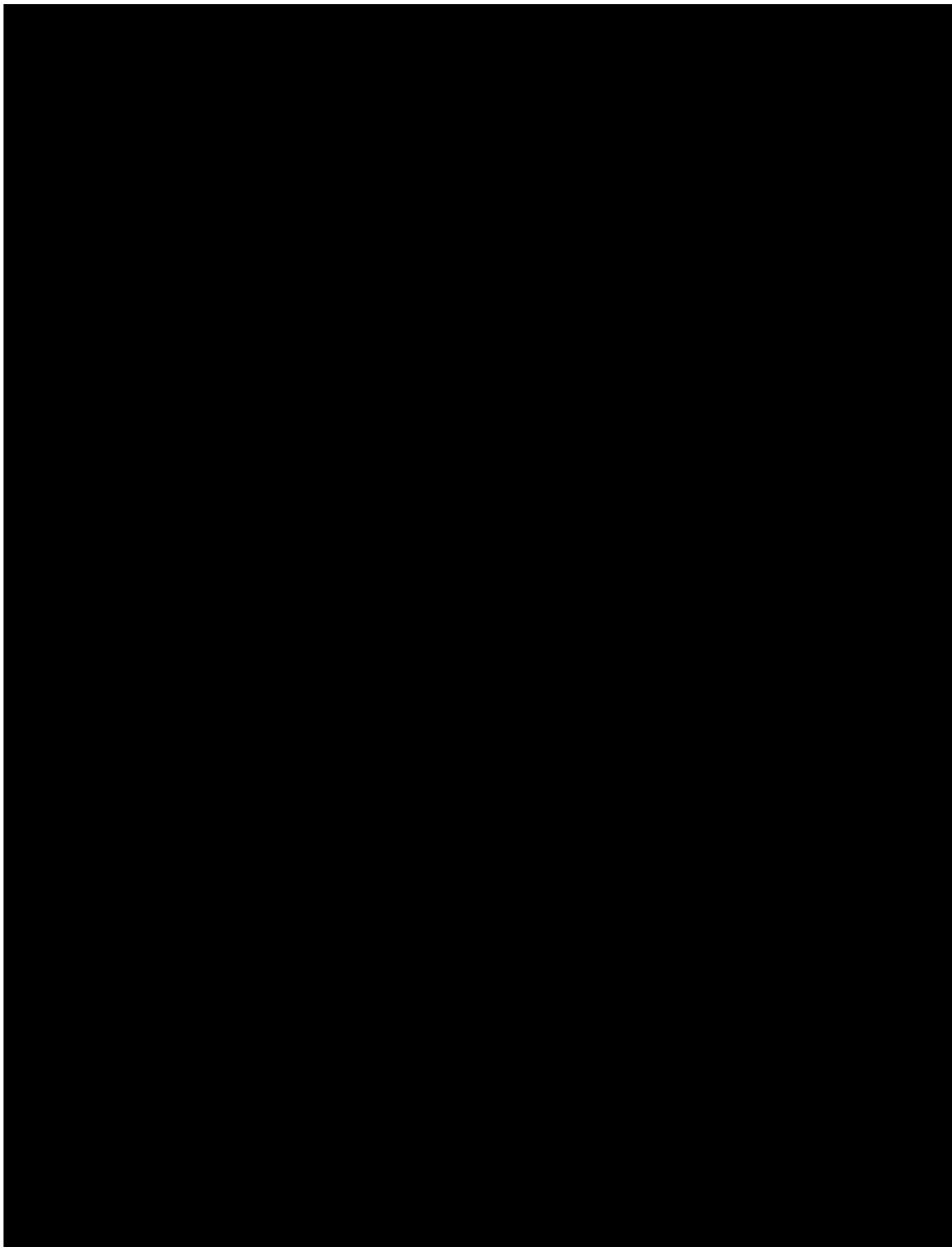
g. The FBI also found in the residence and seized, among other things, two one-kilogram gold bars and eleven one-ounce gold bars.





- ii. From speaking to other law enforcement officers and reviewing photographs of seized property and documents obtained pursuant to grand jury subpoena, I know that the serial numbers of the two one-kilogram bars of gold and the other nine of the eleven one-ounce bars of gold found in Menendez and Arslanian's home match serial numbers of gold bars listed in an inventory of gold in Fred Daibes's possession last updated by an employee of Daibes in approximately 2013. Additionally, a picture of two additional one-kilogram bars of gold found on the Seized Arslanian Cellphone depict serial numbers of gold bars listed in this inventory. The metadata of this picture shows that it was taken on the afternoon of March 31, 2022, when, I know from reviewing text messages and interview reports, Arslanian met with [REDACTED] and sold him two one-kilogram bars of gold, claiming that she had inherited these bars of gold from her mother. Accordingly, I believe that Daibes provided Arslanian and/or Menendez with at least four one-kilogram bars of gold and nine one-ounce bars of gold that had been in his possession since approximately 2013, and that Arslanian sold two of those one-kilogram bars of gold on March 31, 2022, falsely claiming that they had been inherited from her mother to disguise the fact that they had been provided by Daibes.

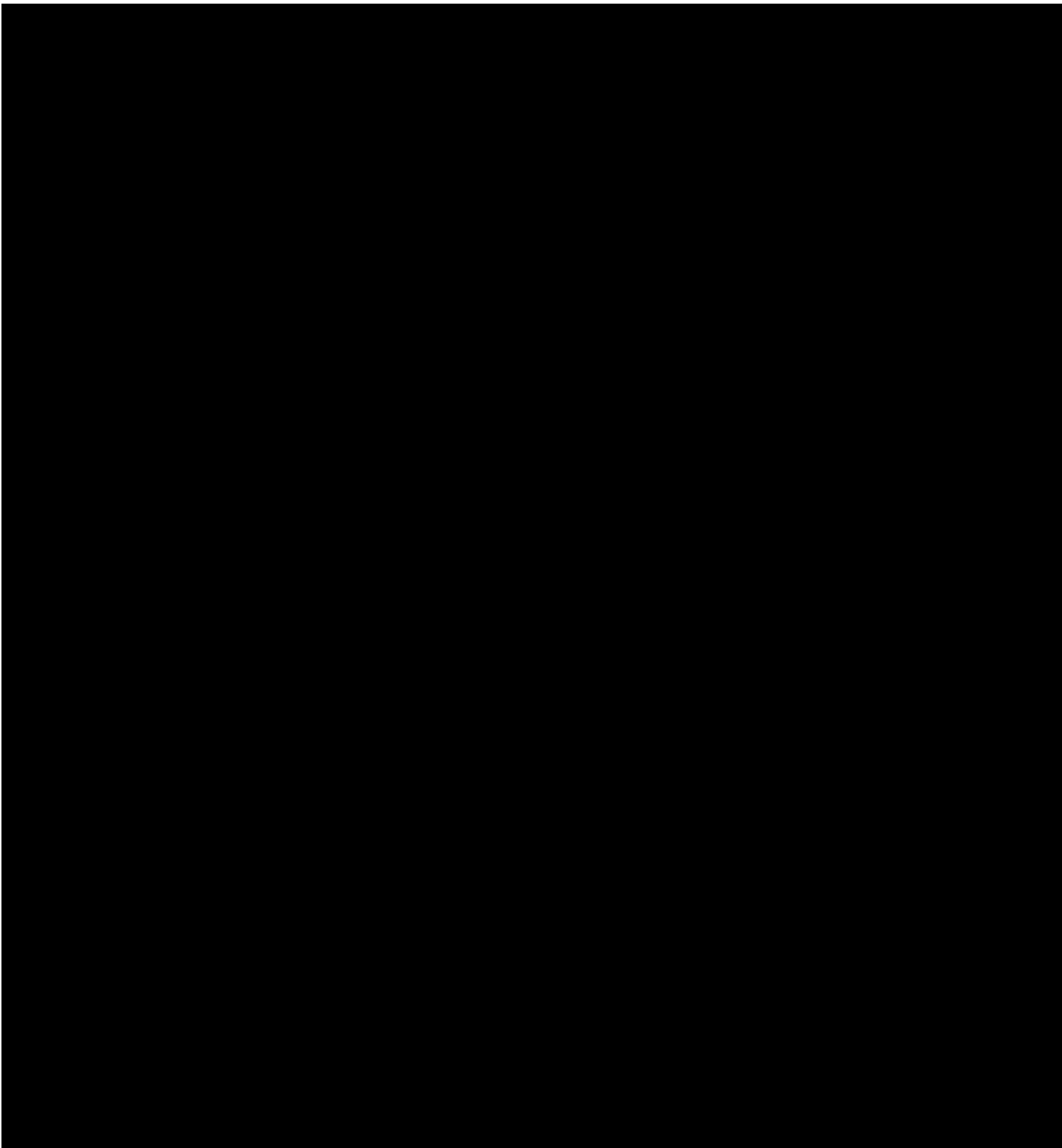




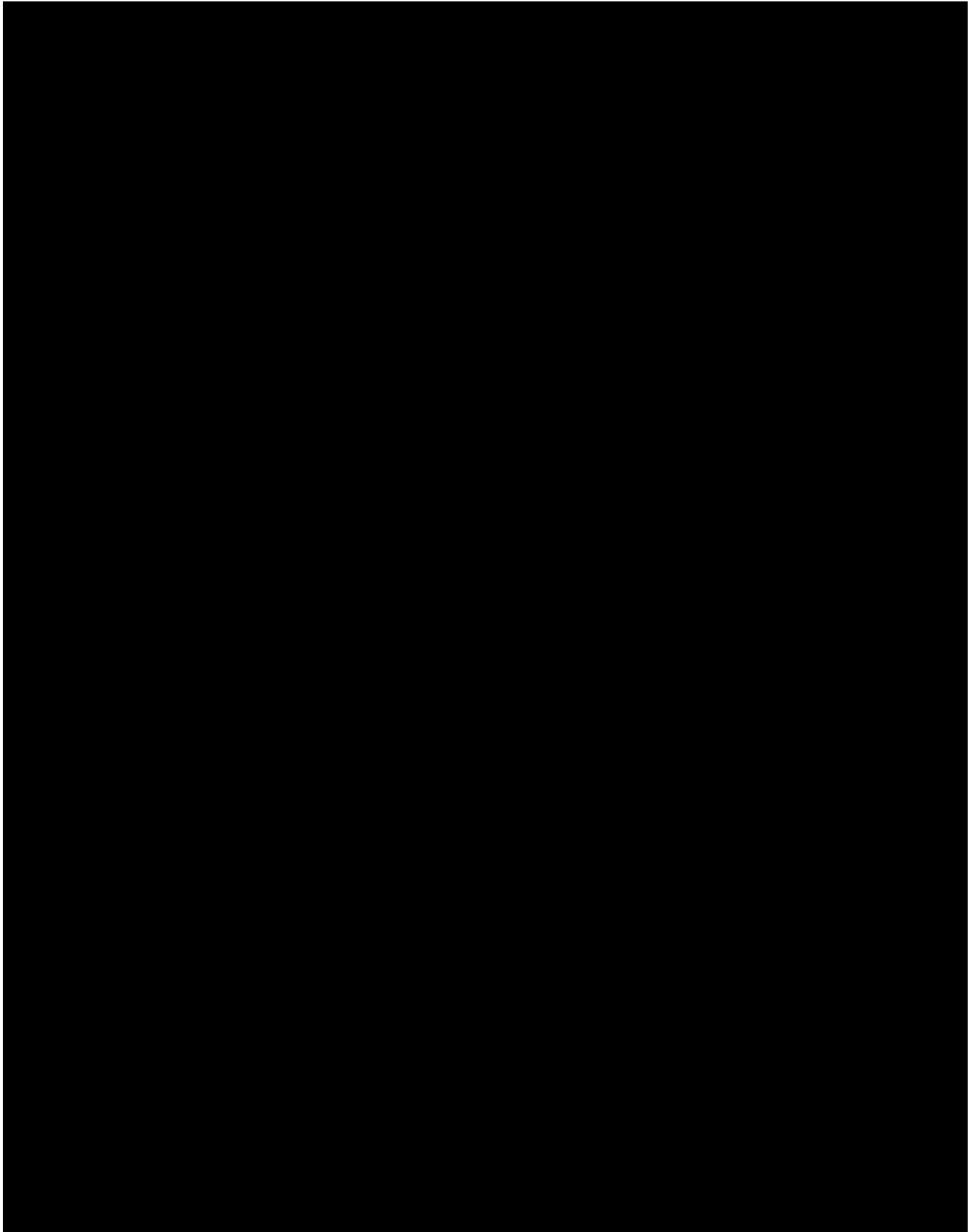
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85. Menendez's financial disclosure form for calendar year 2022, which was filed in June 2023, listed four sales of gold bullion as transactions, but did not list the receipt of any gold bars as income.¹²⁶

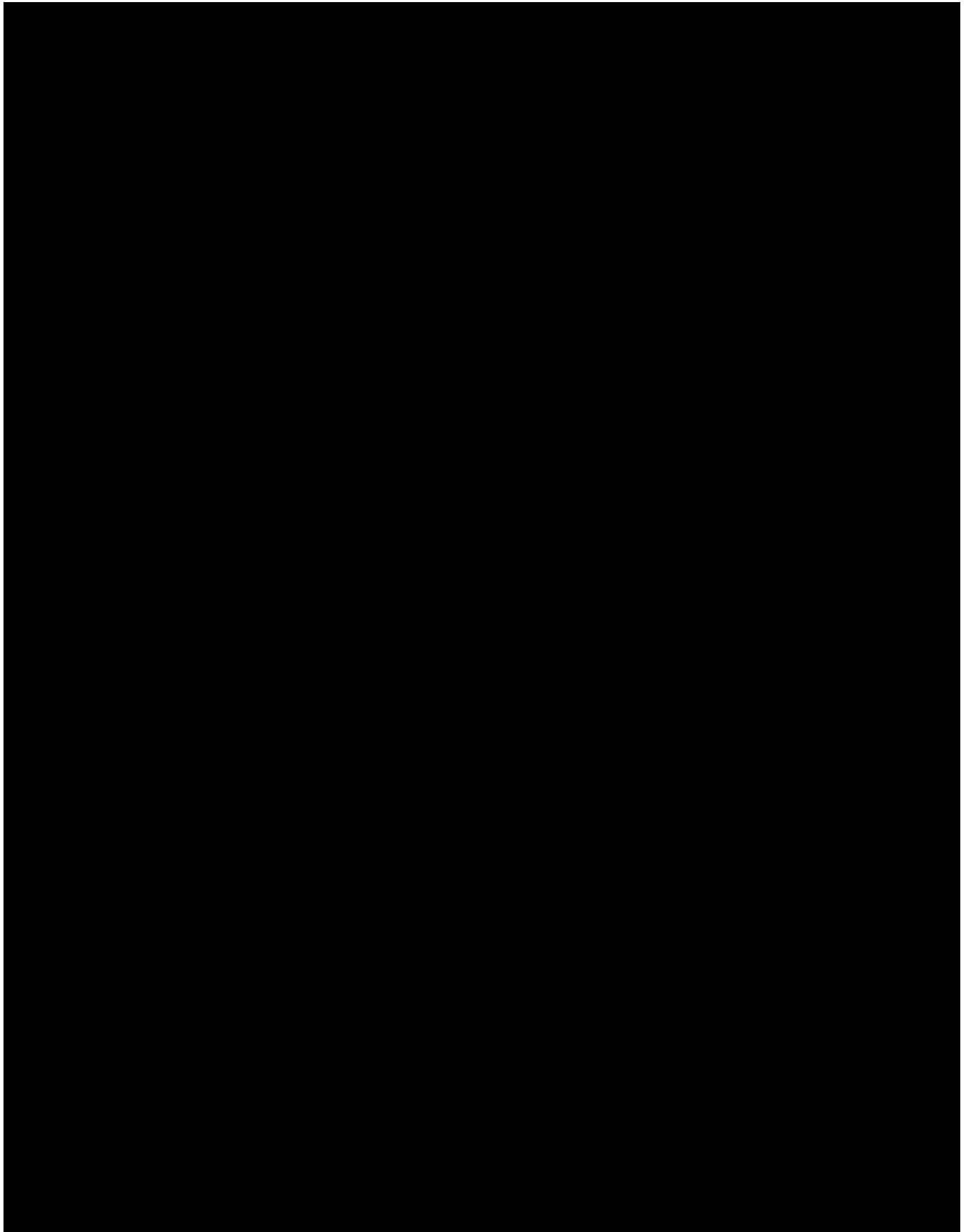
¹²⁶ I have been informed by other law enforcement personnel that counsel for Menendez, counsel for Arslanian, and counsel for Uribe have each spoken to prosecutors on the investigative team in the summer of 2023 and have each generally denied criminal intent. Among other things, counsel for Menendez has denied that Menendez performed official acts for, or received cash from, Uribe, Daibes, or Hana, has denied that Menendez was aware of Arslanian's receipt of gold bars from Daibes contemporaneously, and has denied that Menendez personally received gold bars from Daibes. Counsel for Menendez has claimed that Menendez had a preexisting friendship with Daibes, and that Menendez has on occasion given gifts to Daibes, although generally of lesser value than the gifts Menendez received from Daibes, and has claimed that Menendez's relationship with Uribe and Hana was entirely derivative of his relationship with Arslanian. Counsel for Menendez has denied being aware that Uribe paid for the Mercedes-Benz Automobile until after the June 2022 searches. Counsel for Arslanian, among other things, has claimed that Arslanian received one kilogram of gold from Daibes as a gift celebrating her engagement to Menendez; one kilogram of gold in order to secure a right of first refusal for Daibes to purchase her residence; and received possession of seven one-ounce gold bars from Daibes to show to a mutual acquaintance to see if that acquaintance wished to purchase them from Daibes. Counsel for Arslanian also claimed that Arslanian performed some unskilled administrative work for Hana, [REDACTED] and others, and was compensated through the Arslanian Company for that work. Counsel for Arslanian also claimed that Uribe provided financial assistance with the periodic payments for the Mercedes-Benz Automobile as a loan, which was always intended to be repaid. Counsel for Arslanian claimed that Arslanian had been friends with Hana and Uribe for years. Counsel for Uribe claimed that he provided funds for Arslanian's purchase of the Mercedes-Benz Automobile as a loan and did not believe Menendez was aware of those payments.



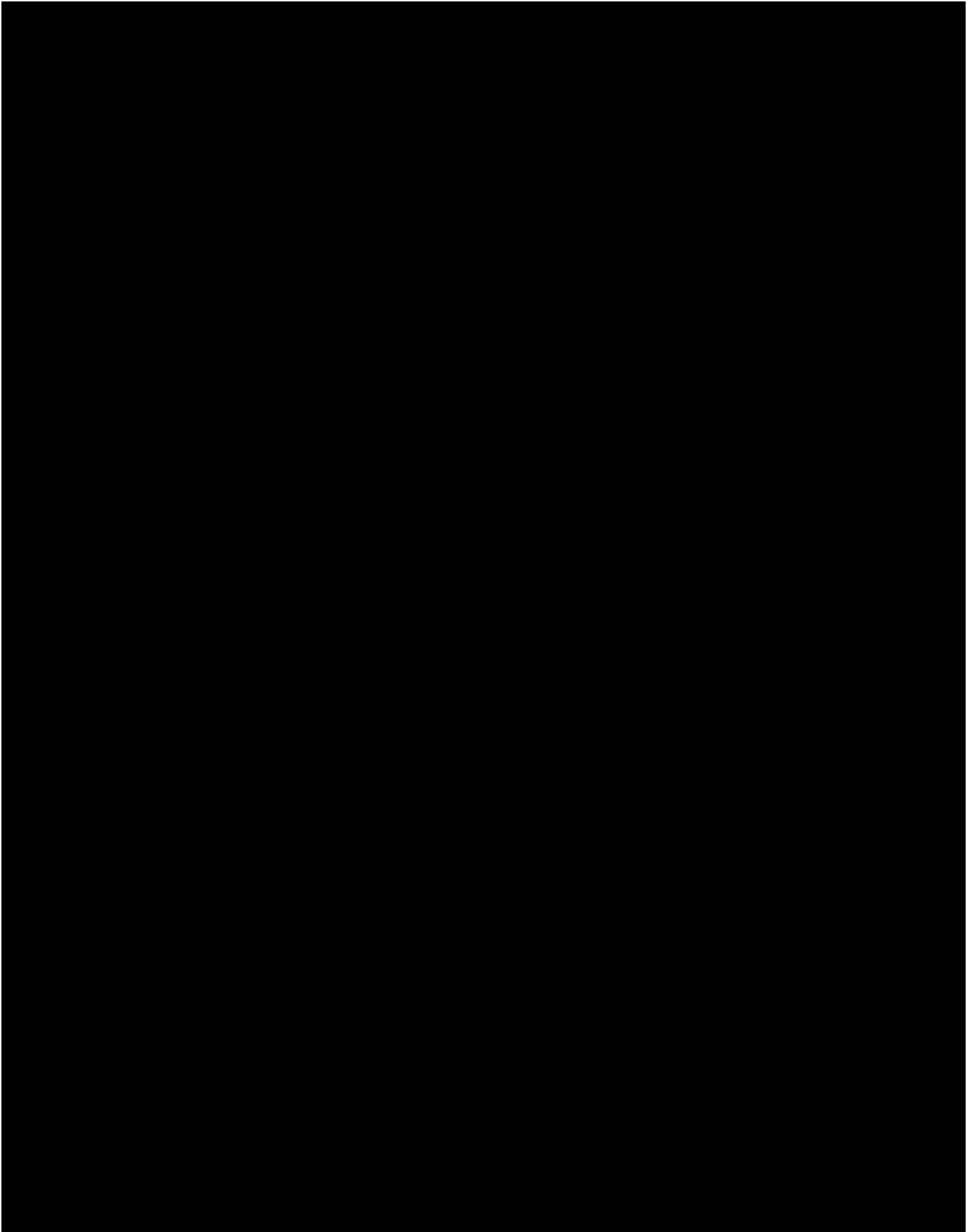
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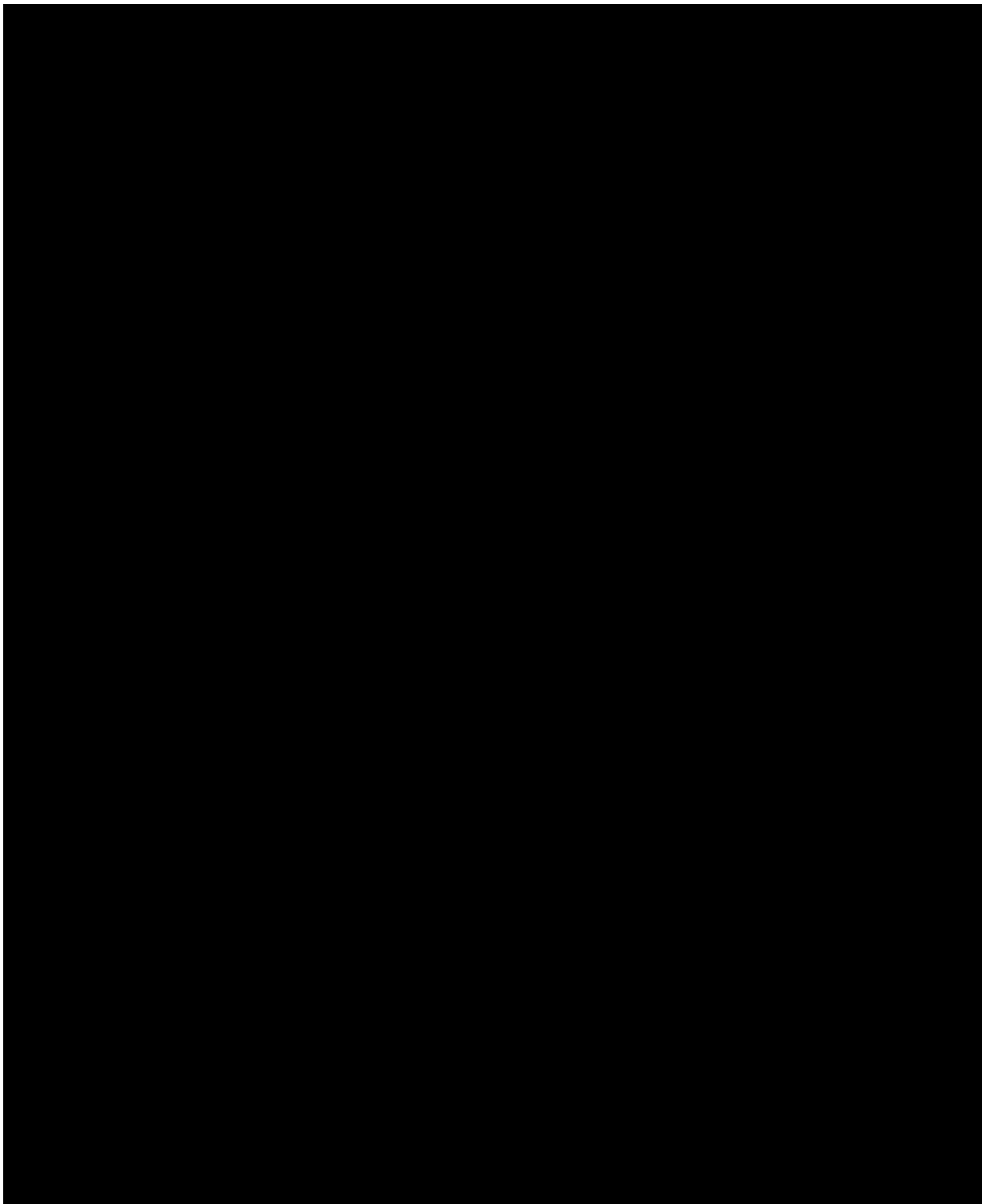


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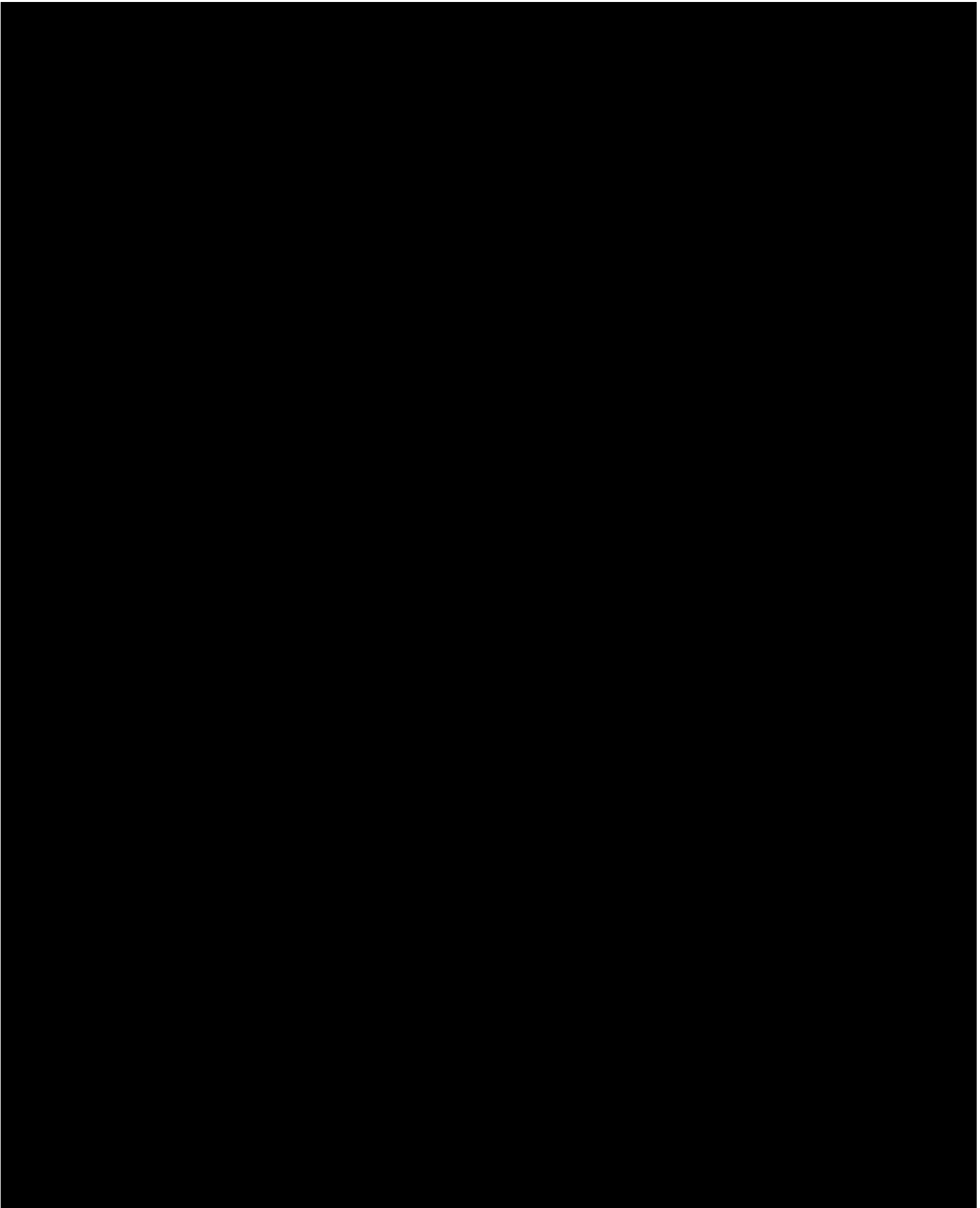
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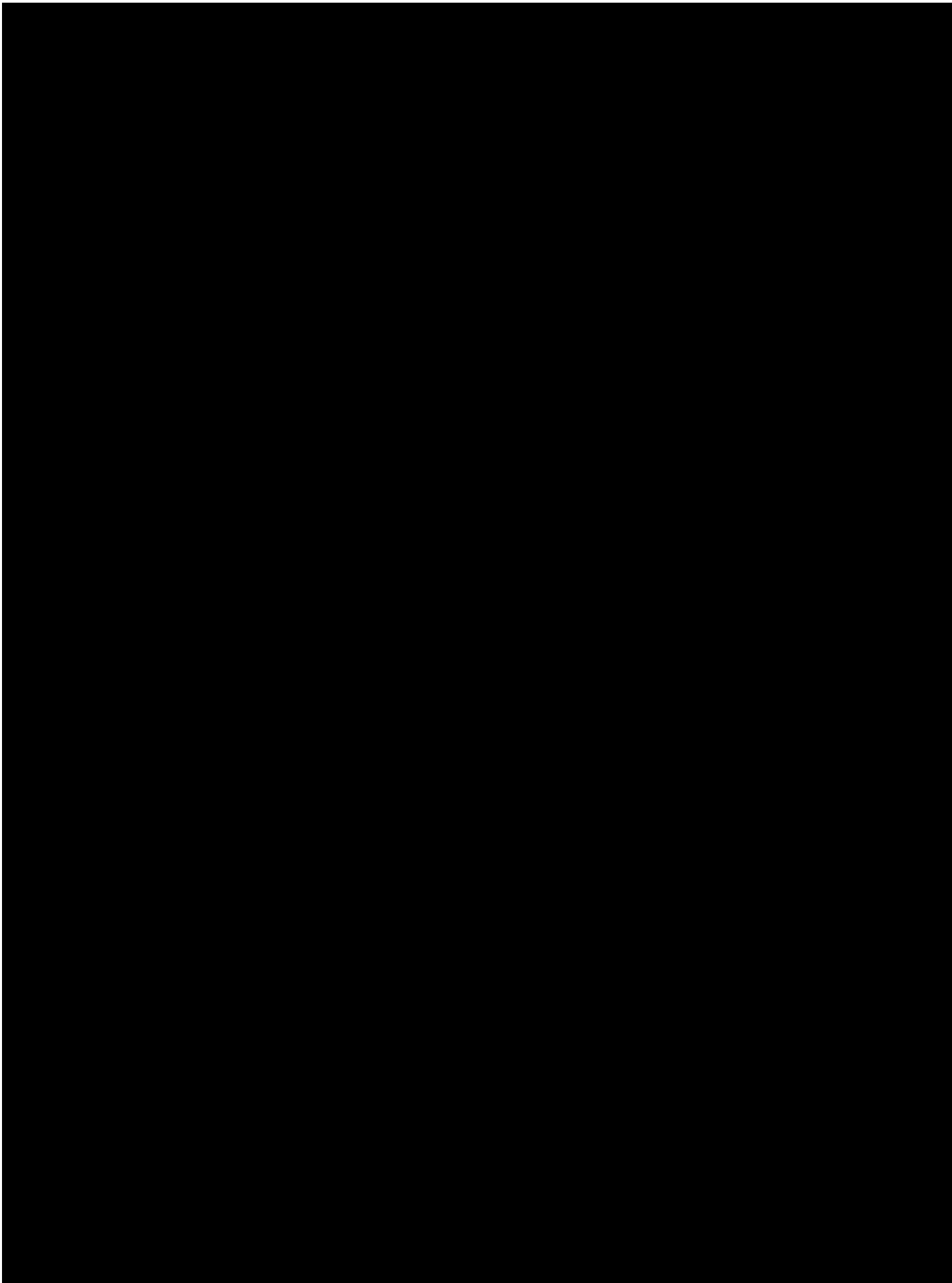


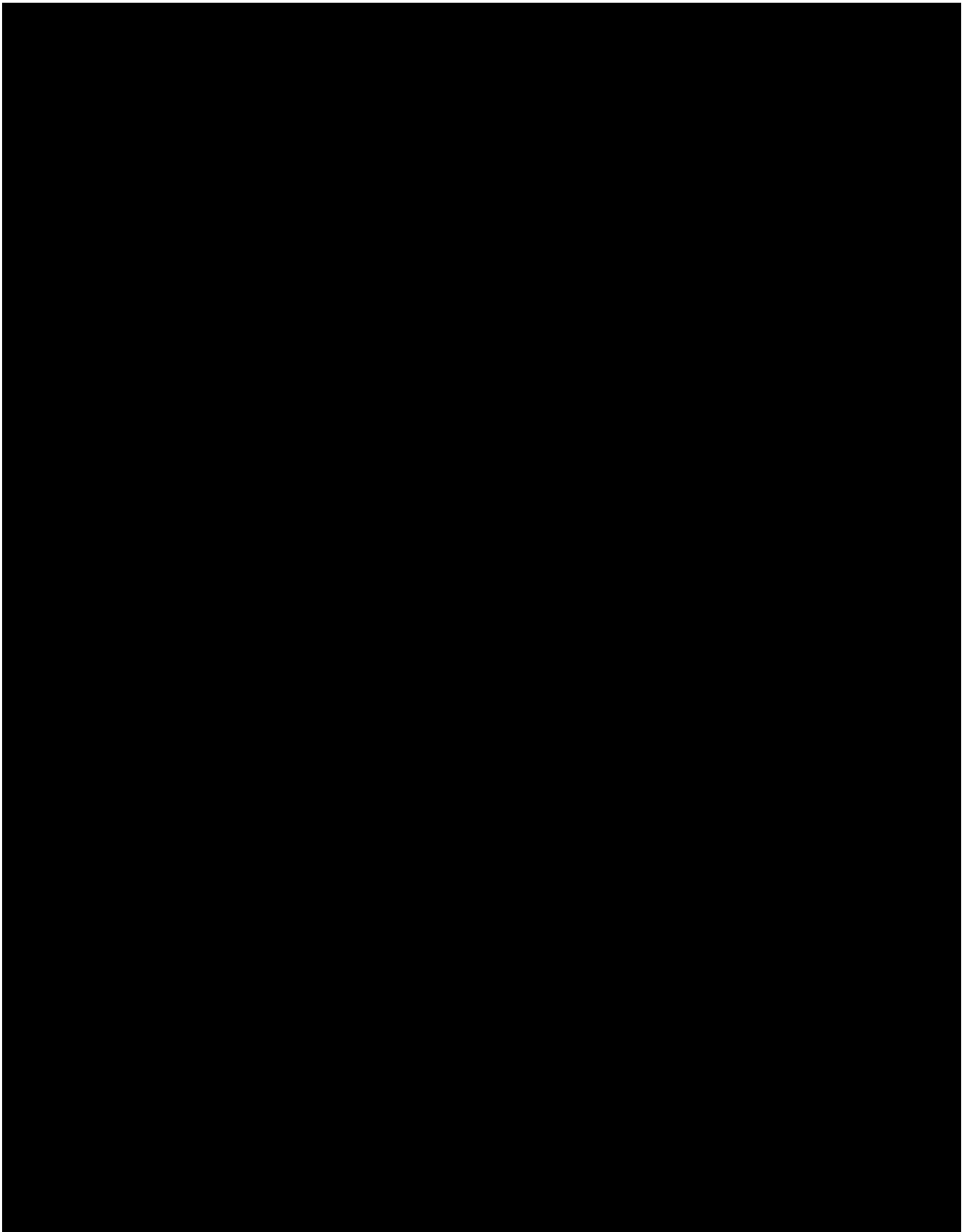


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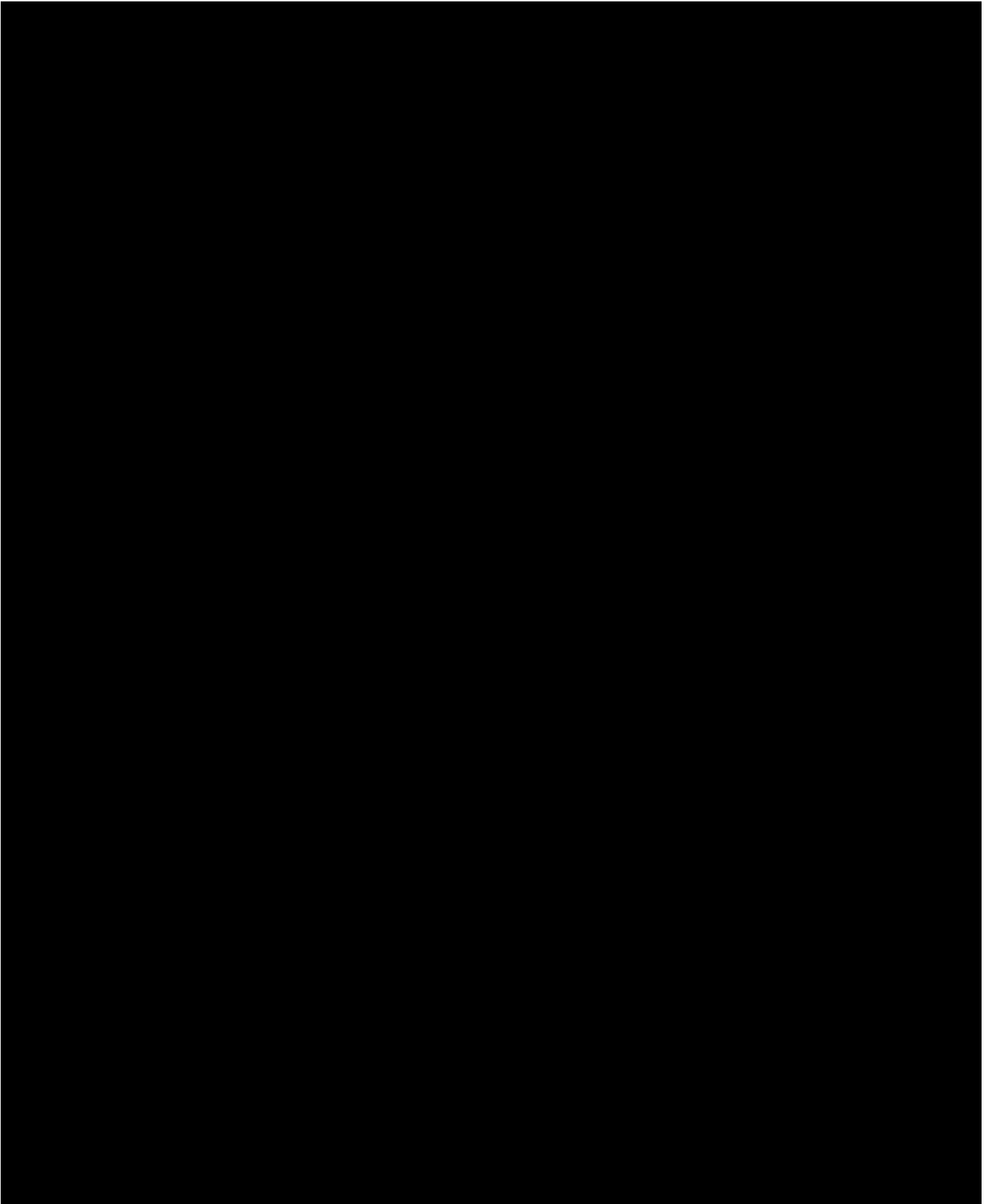
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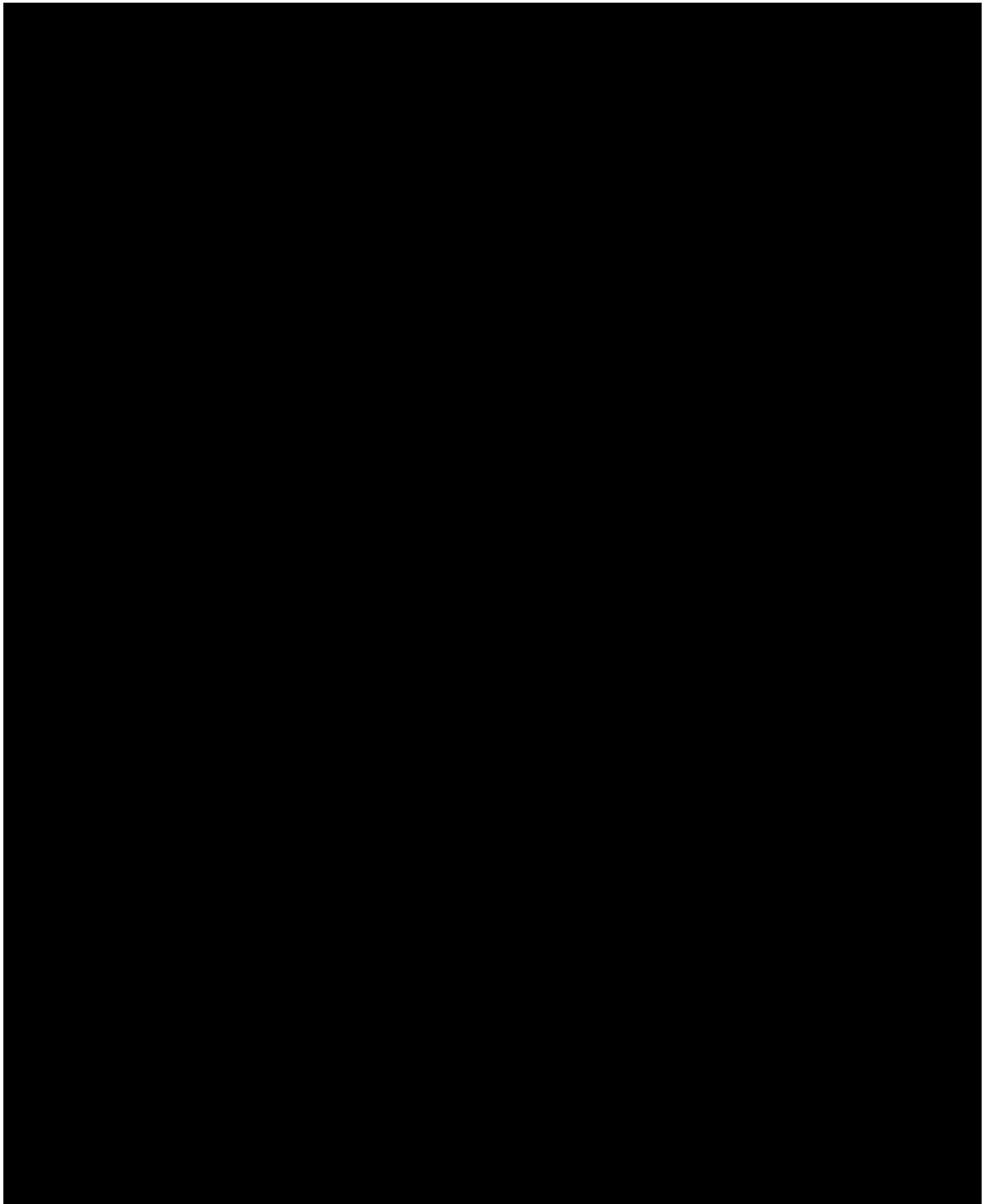




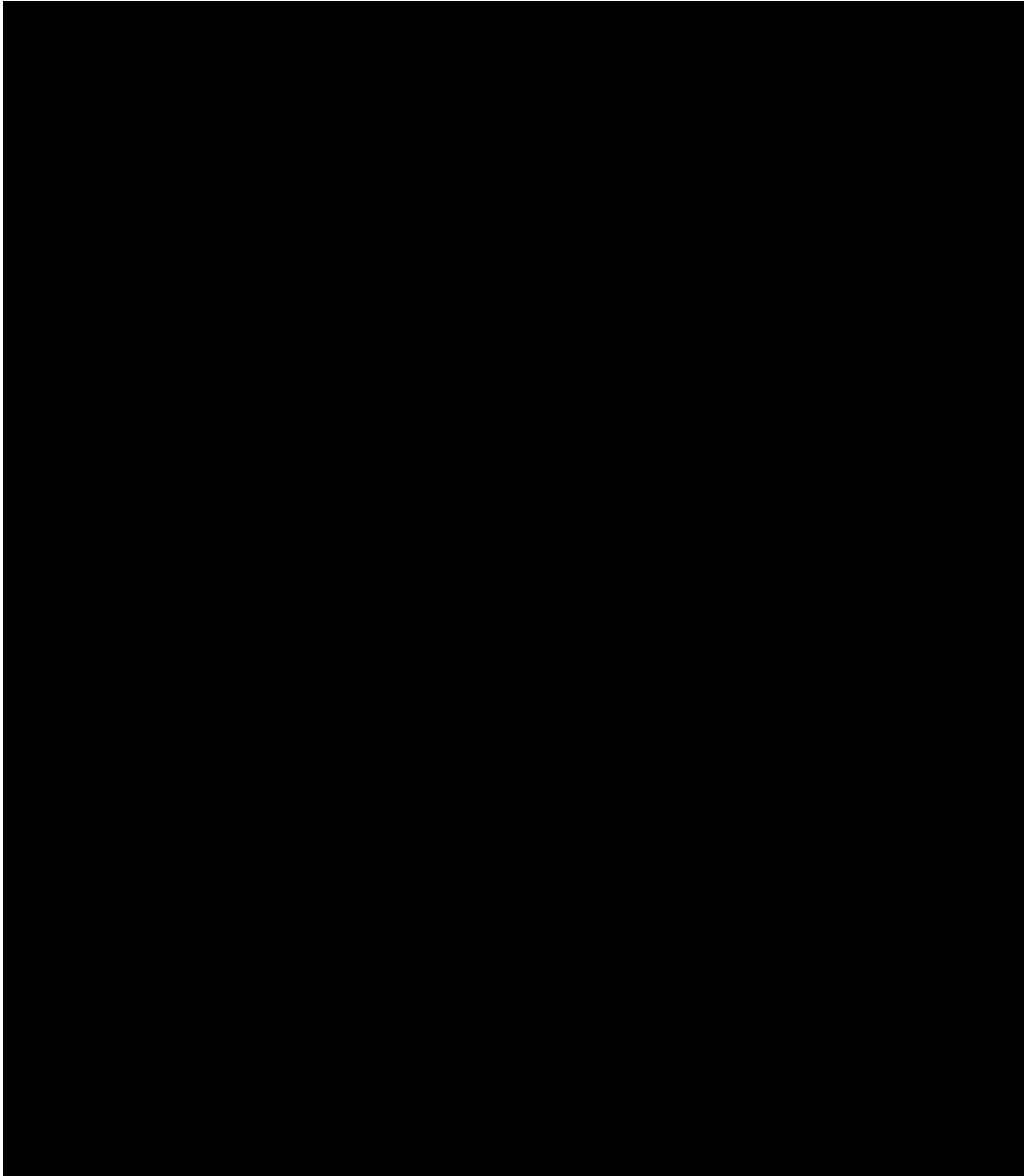
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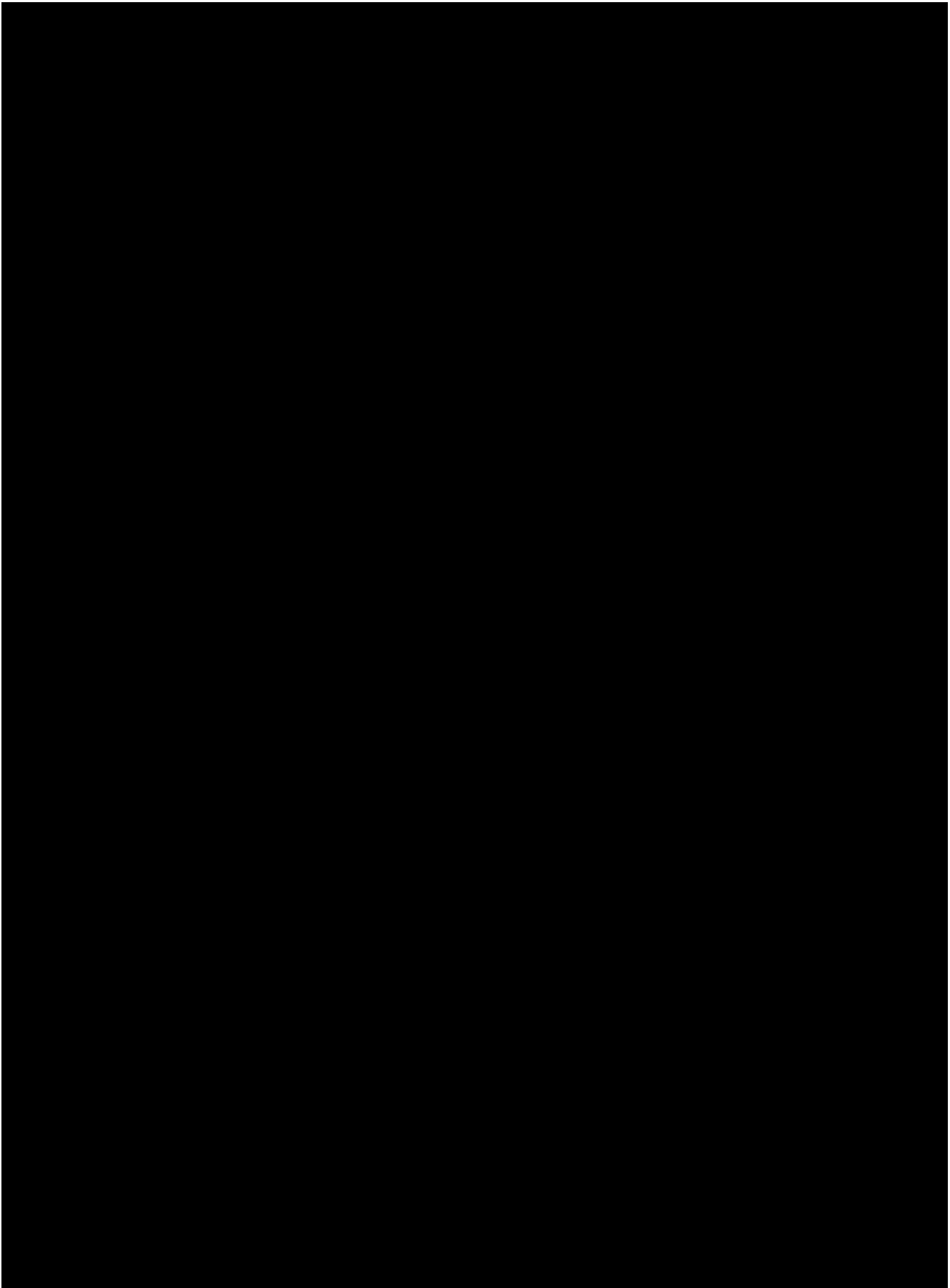
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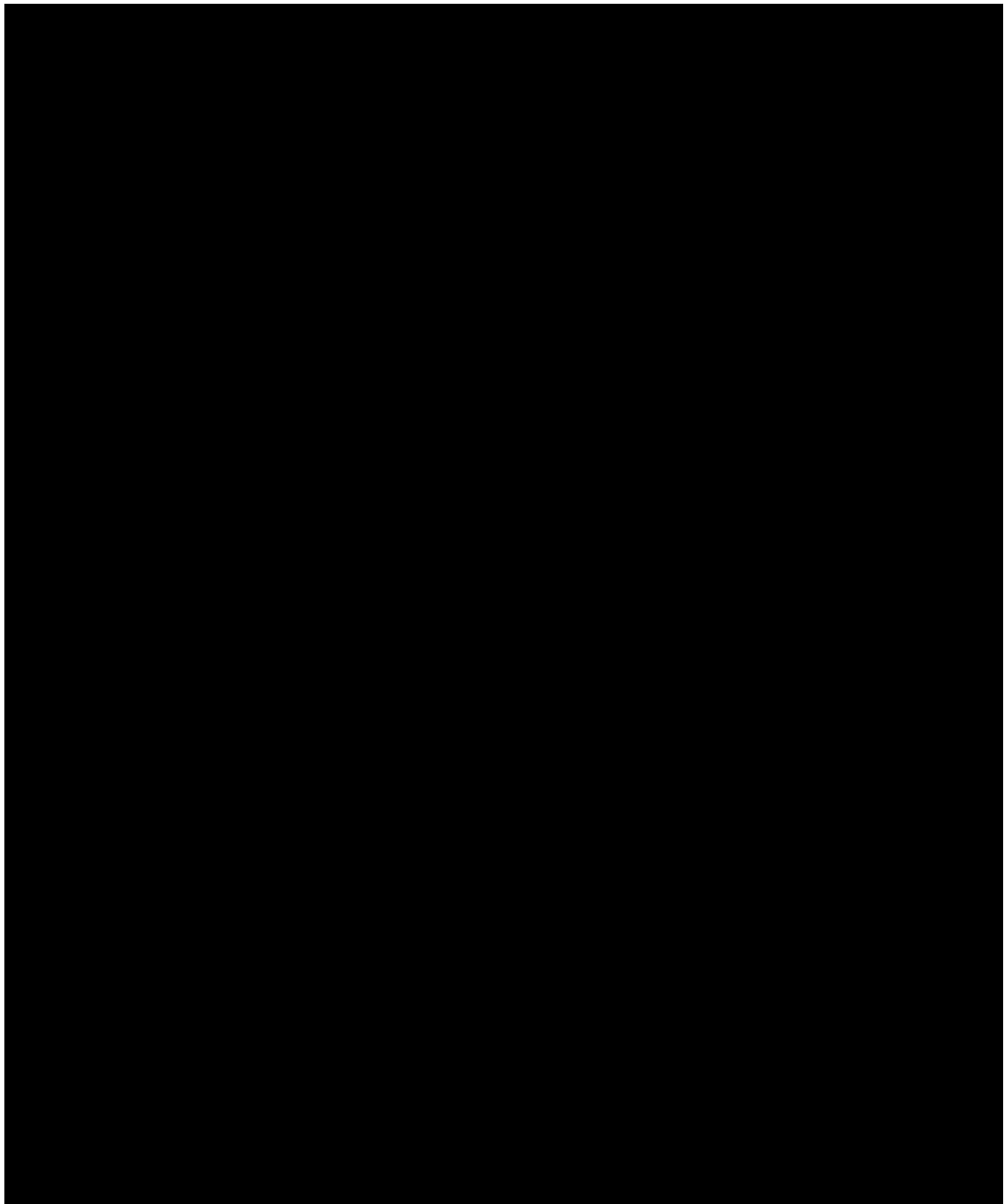


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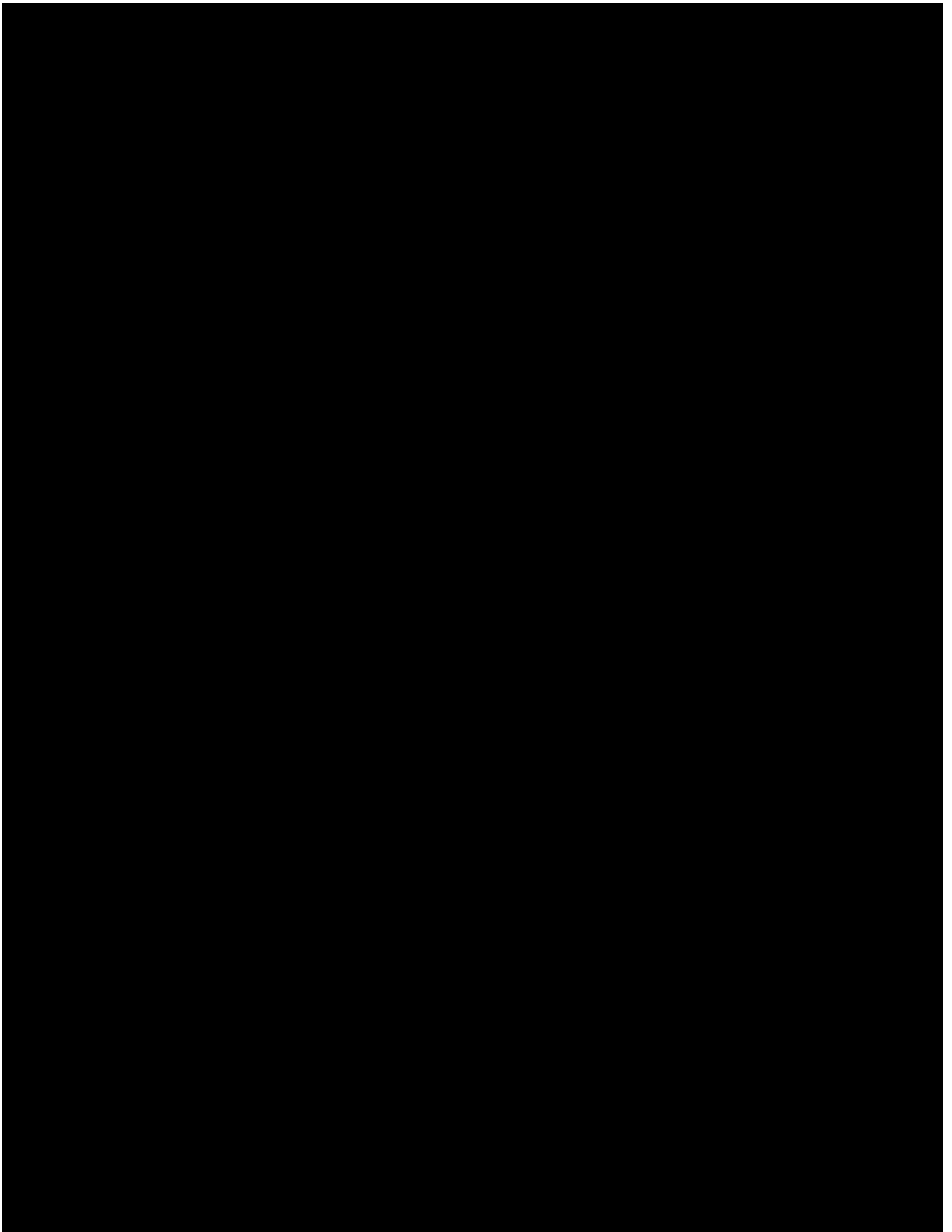


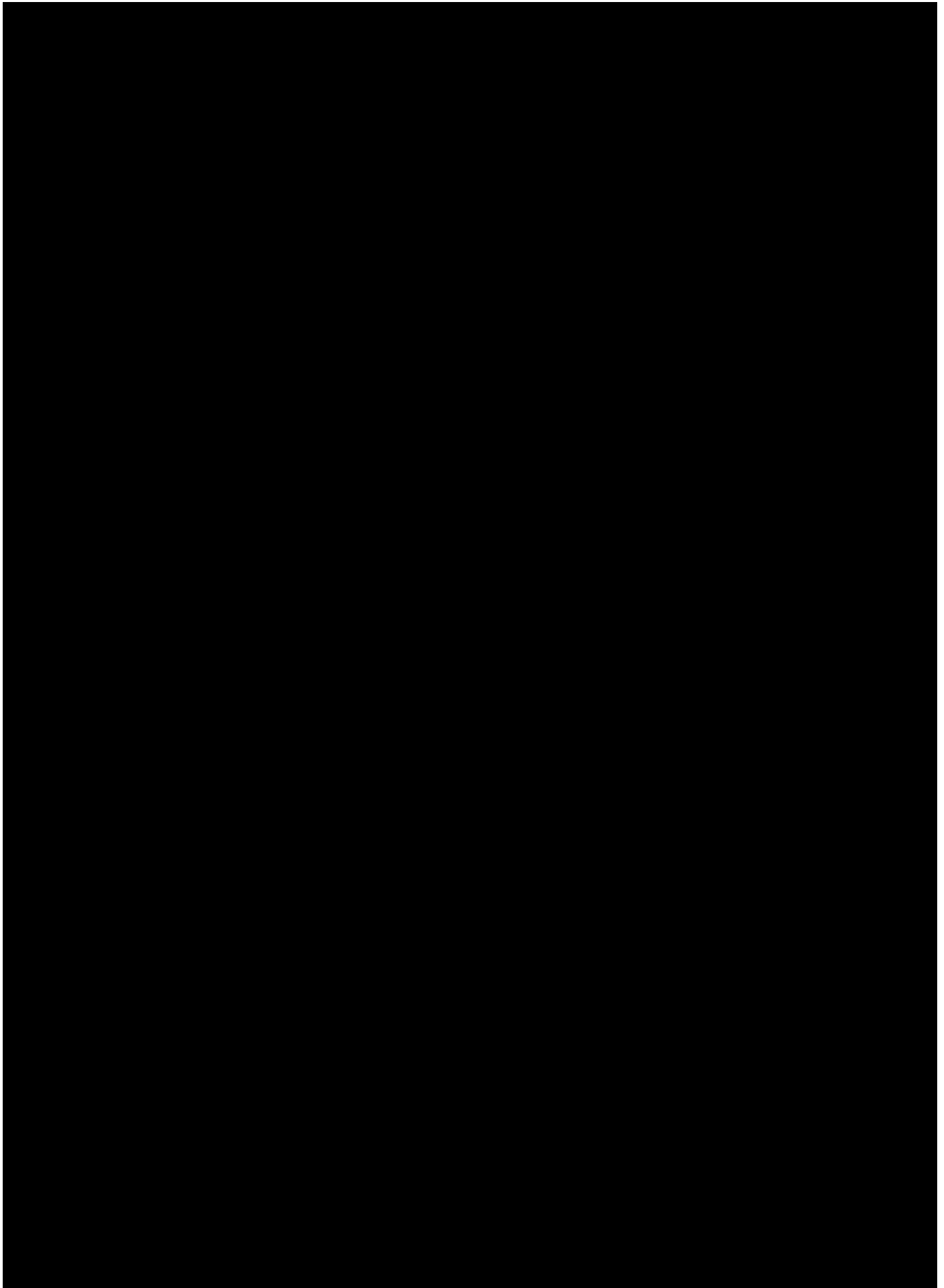
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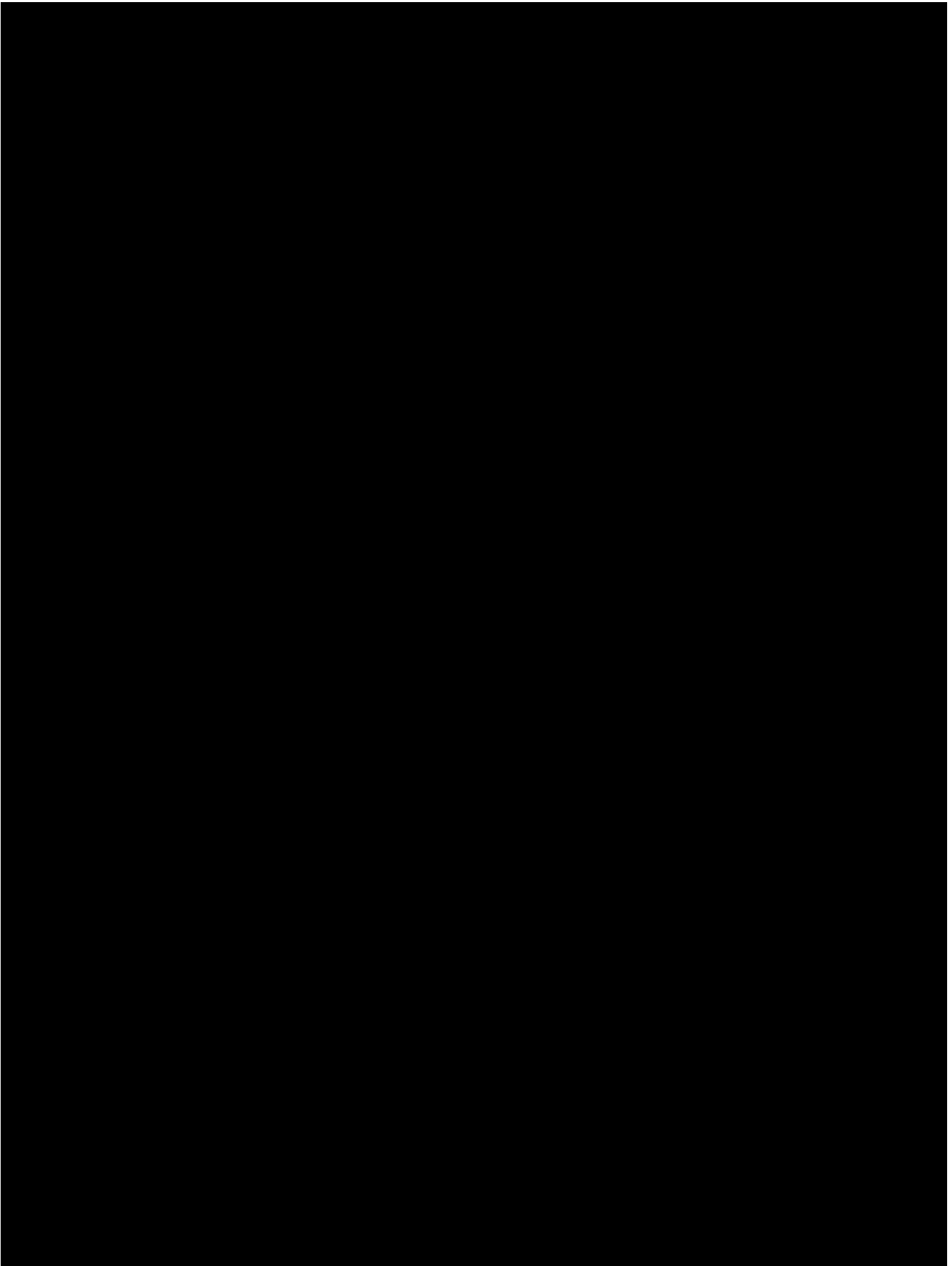
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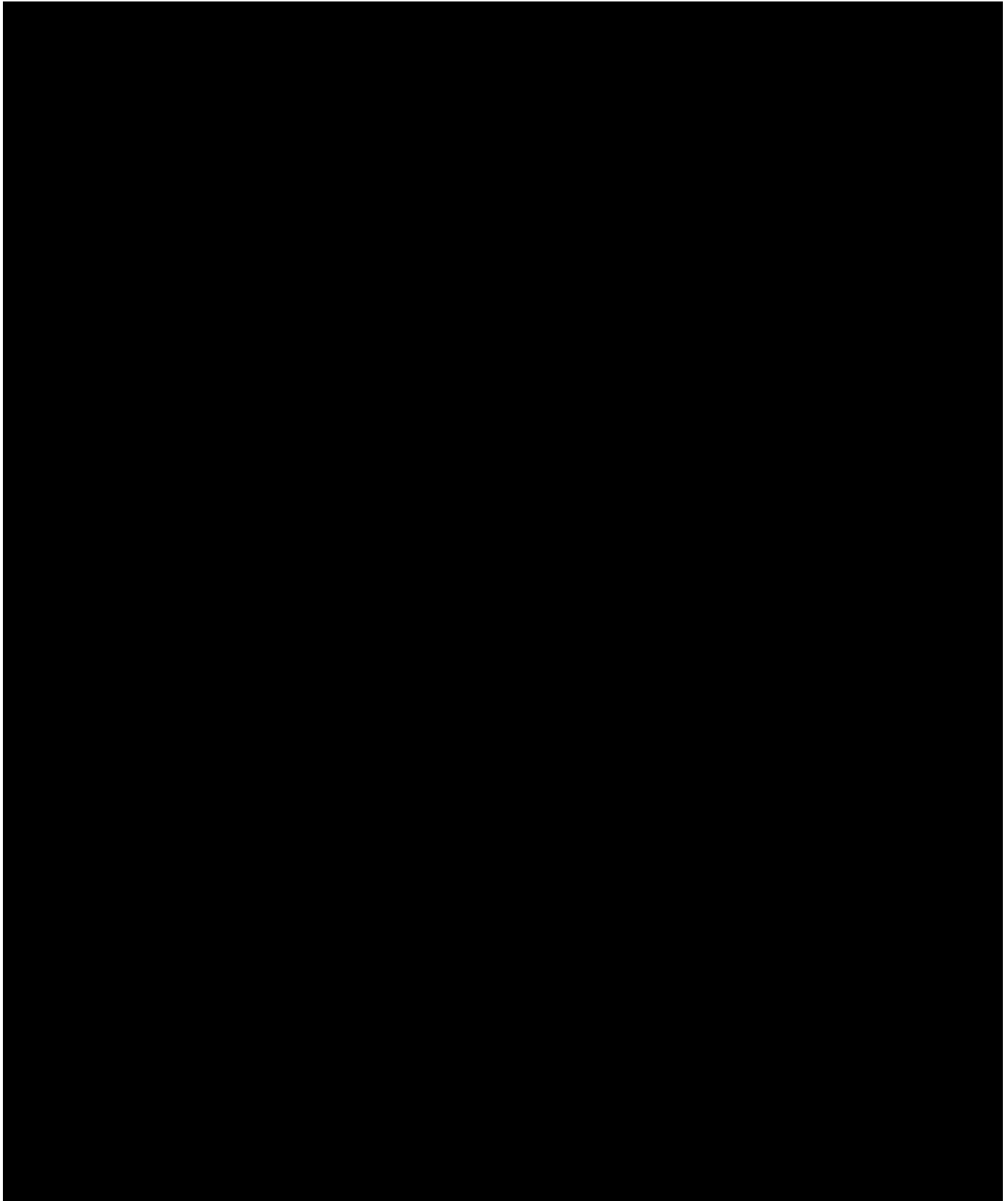
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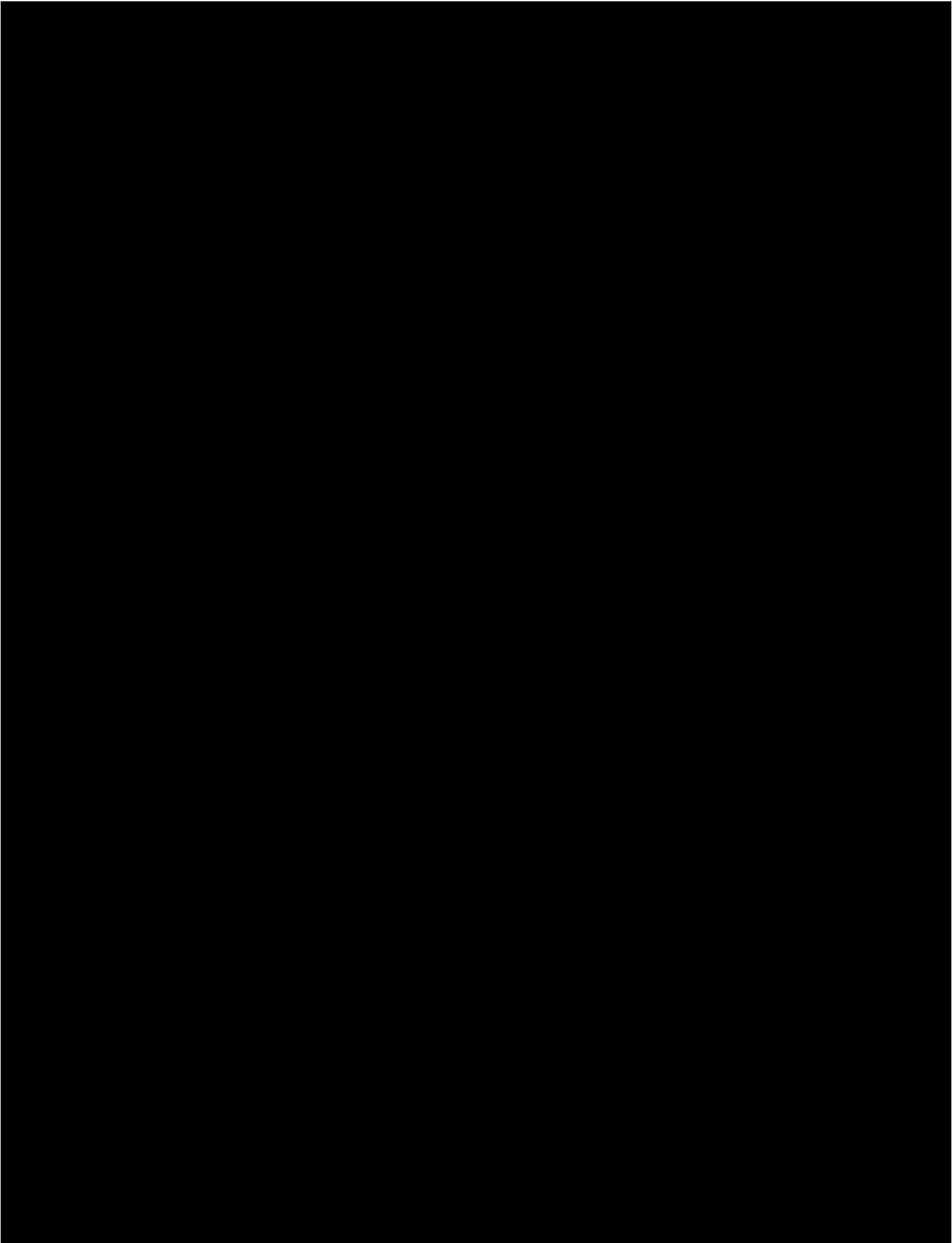




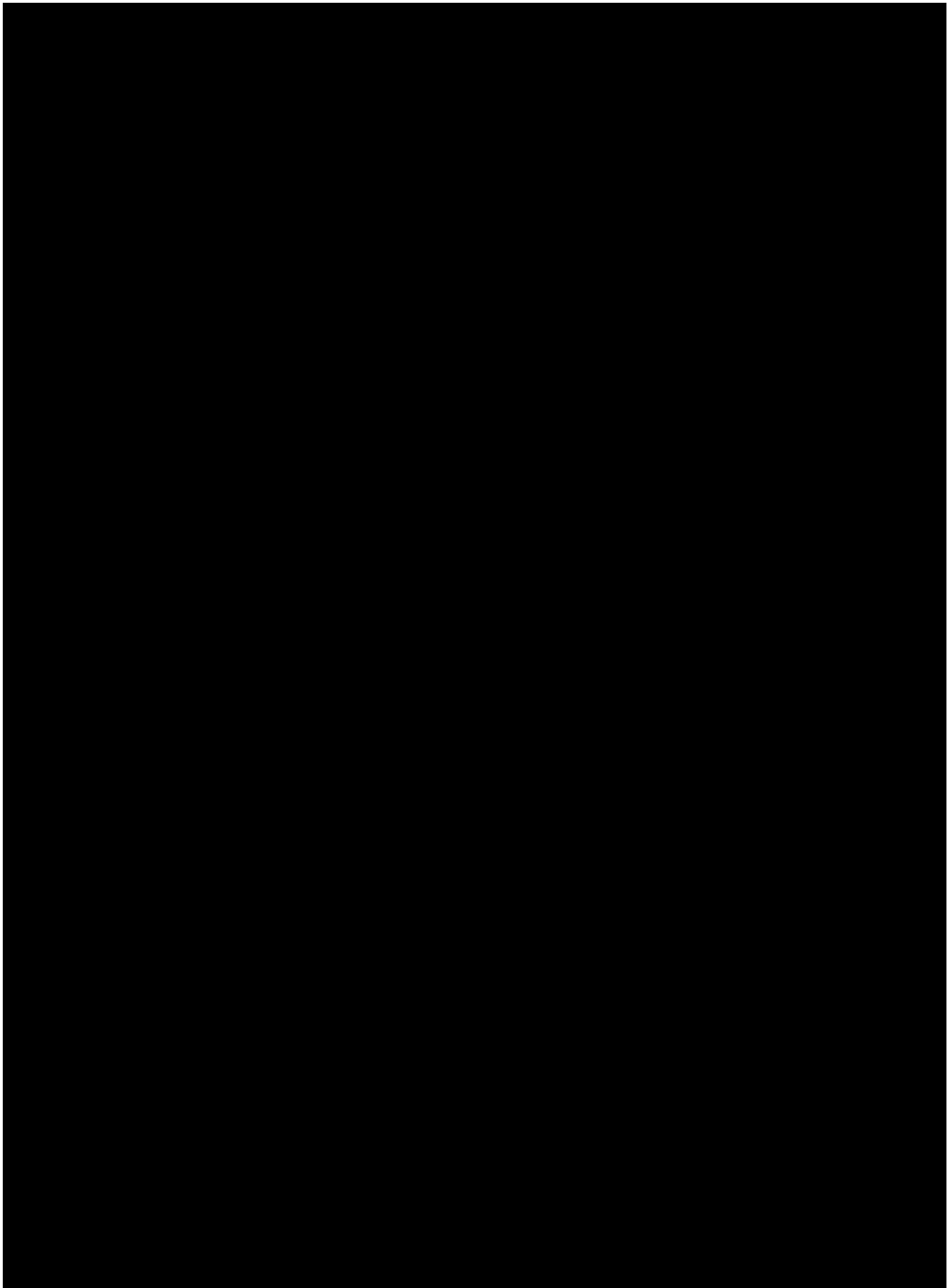
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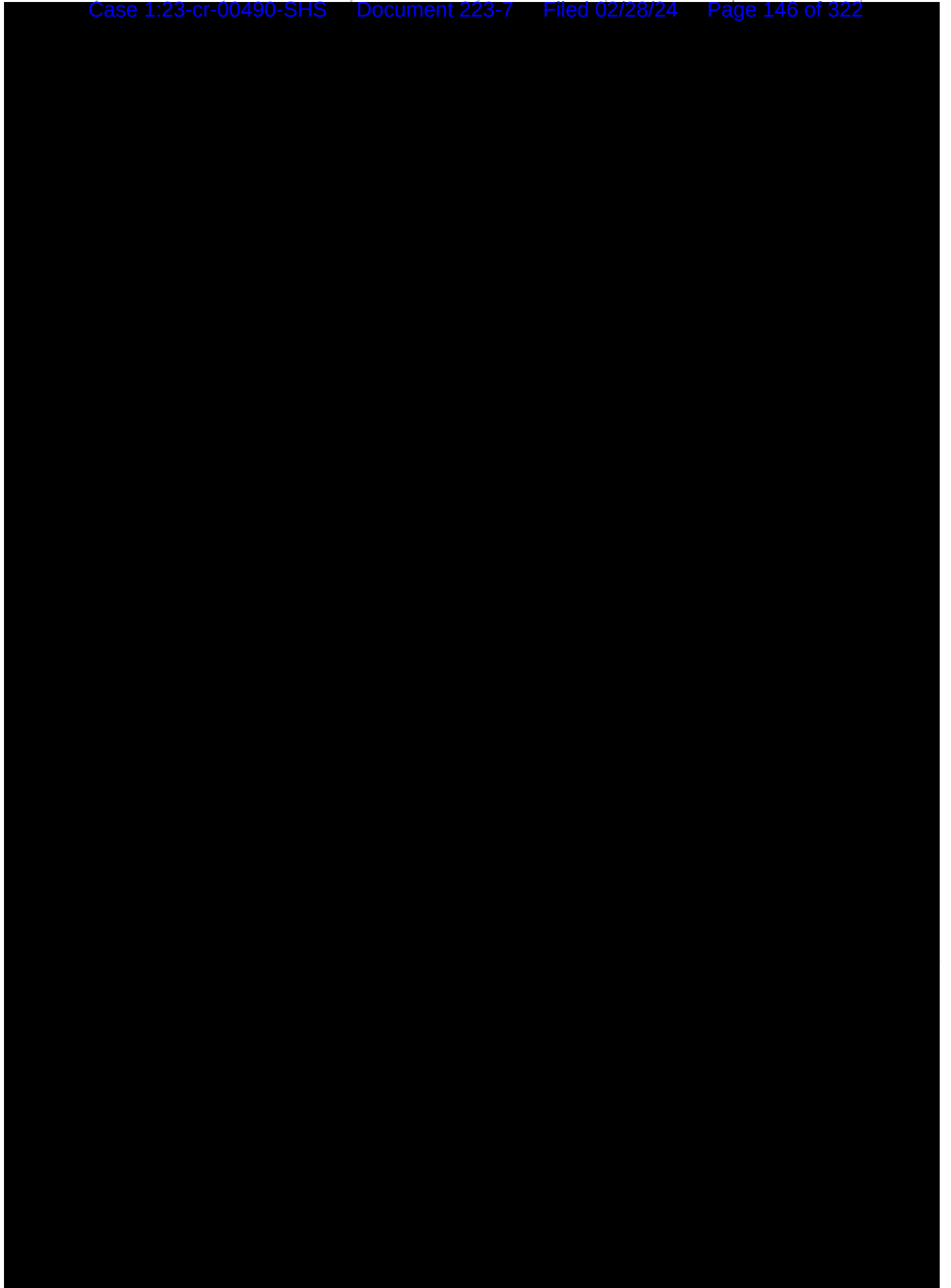


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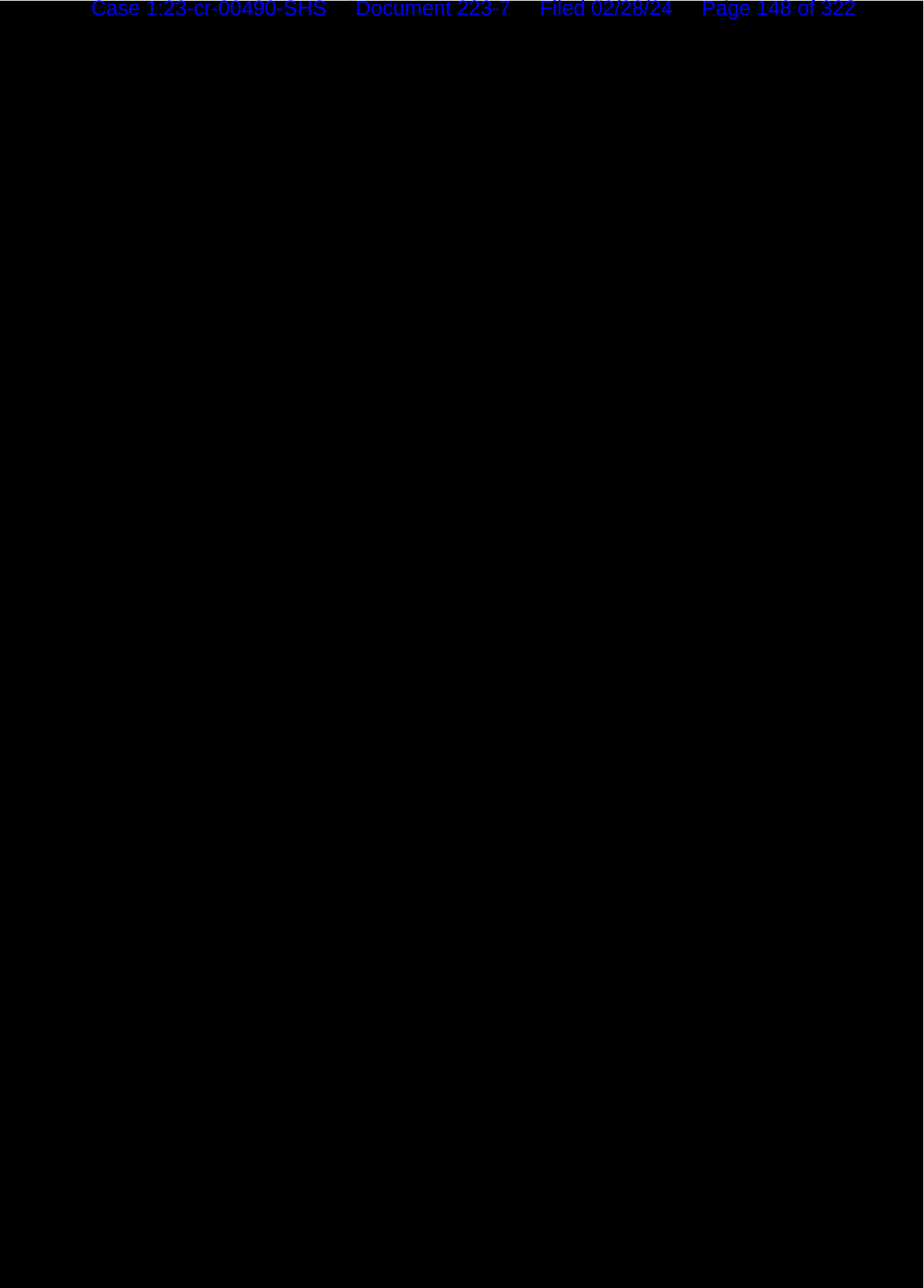
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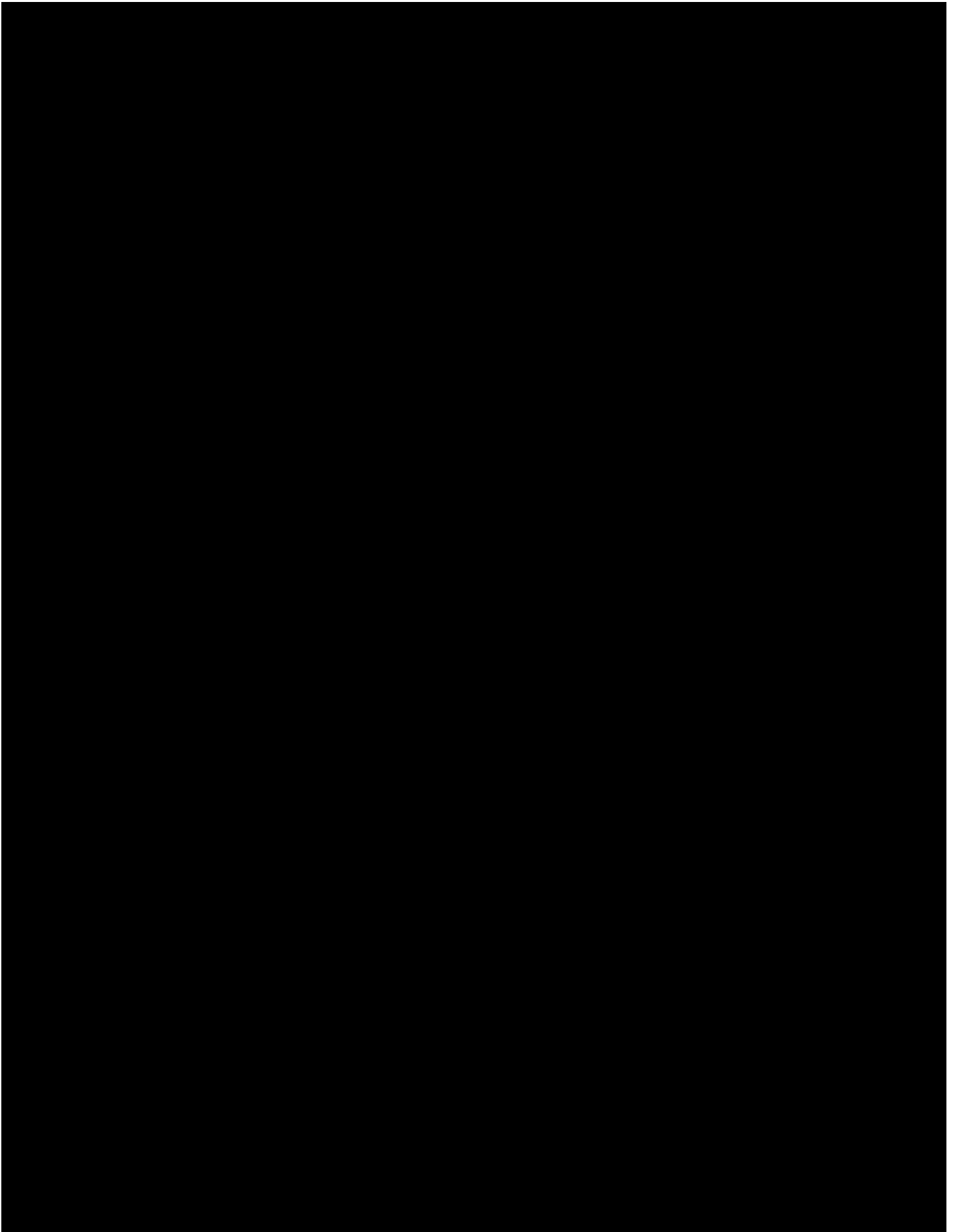


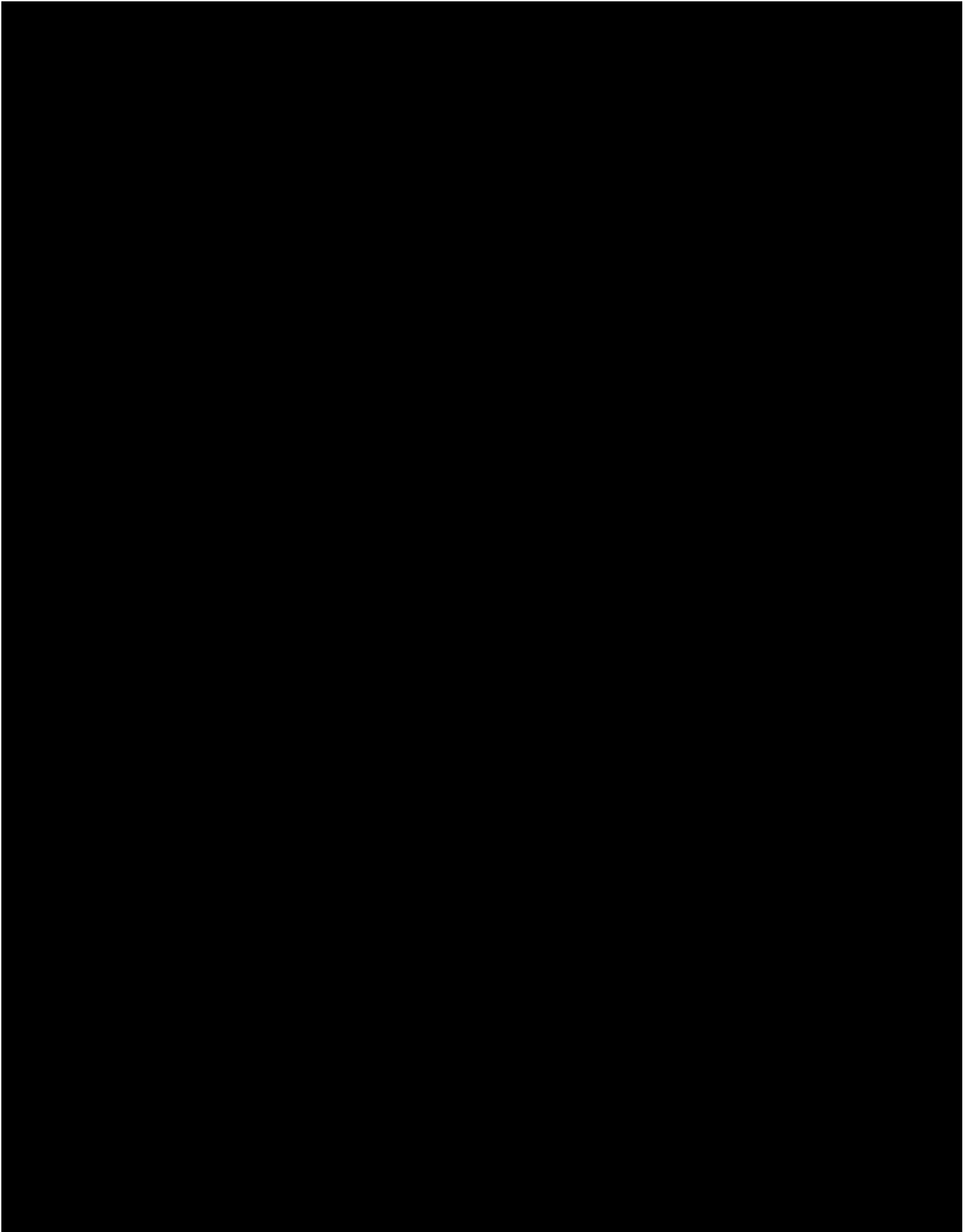


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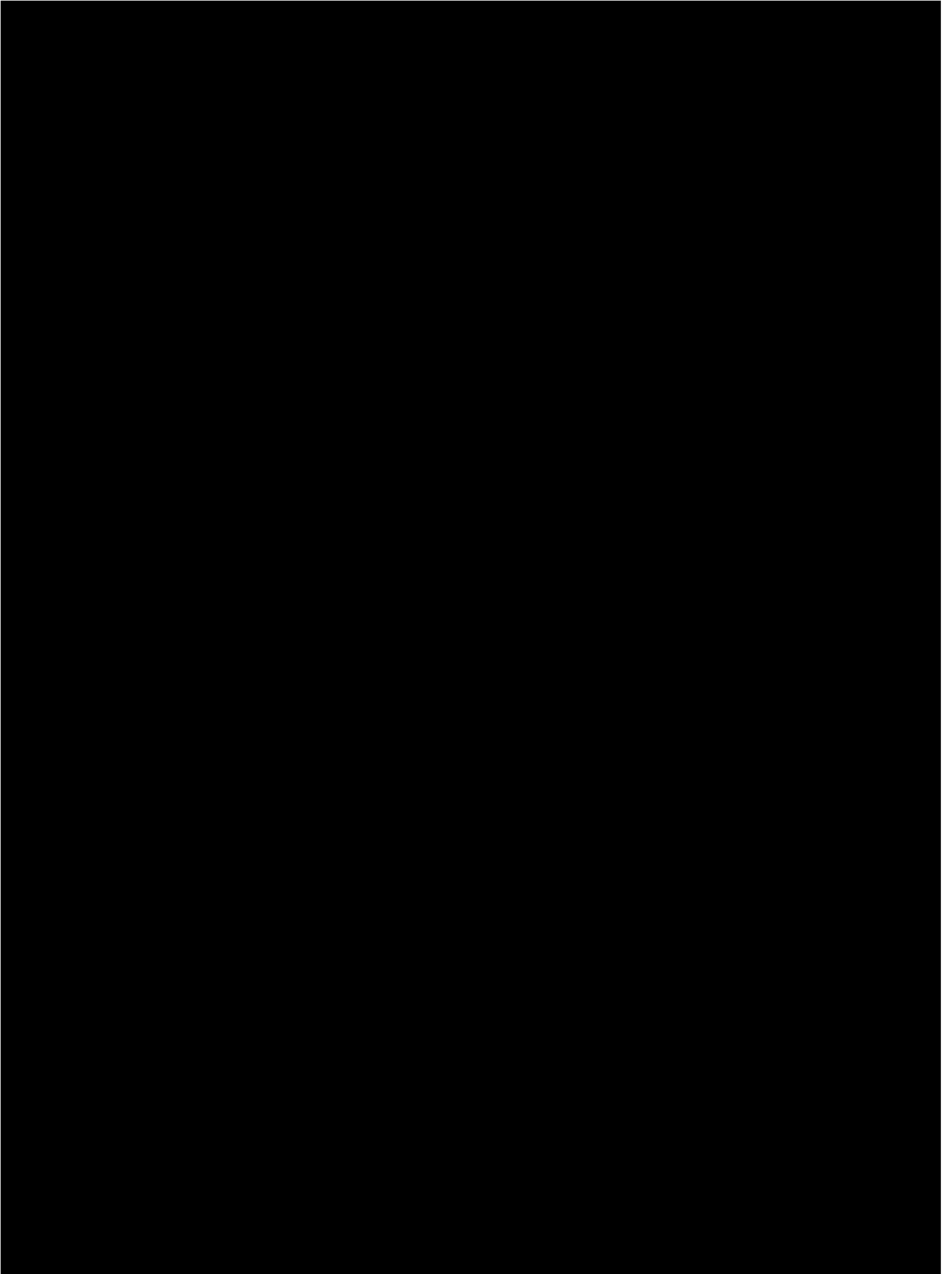
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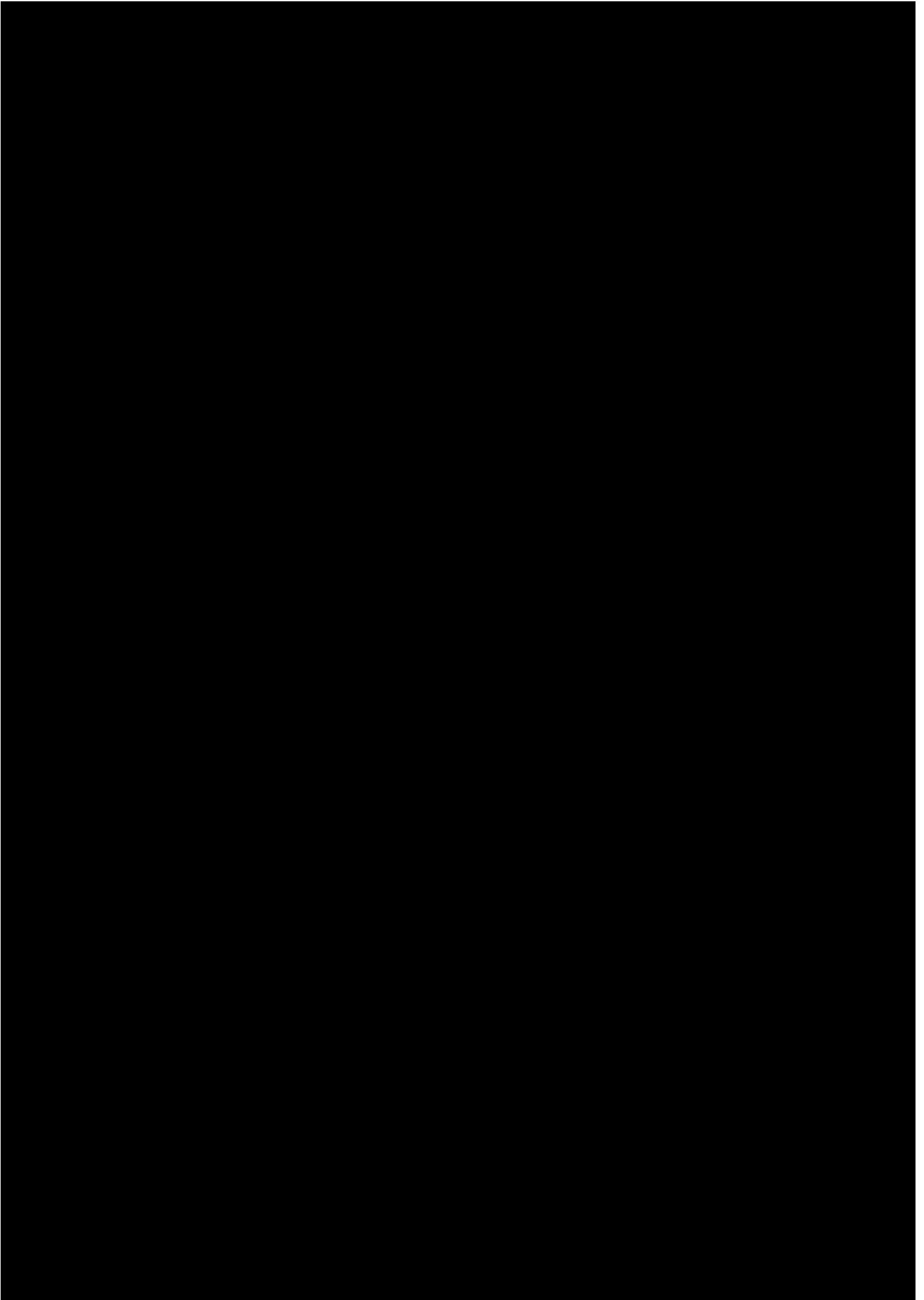


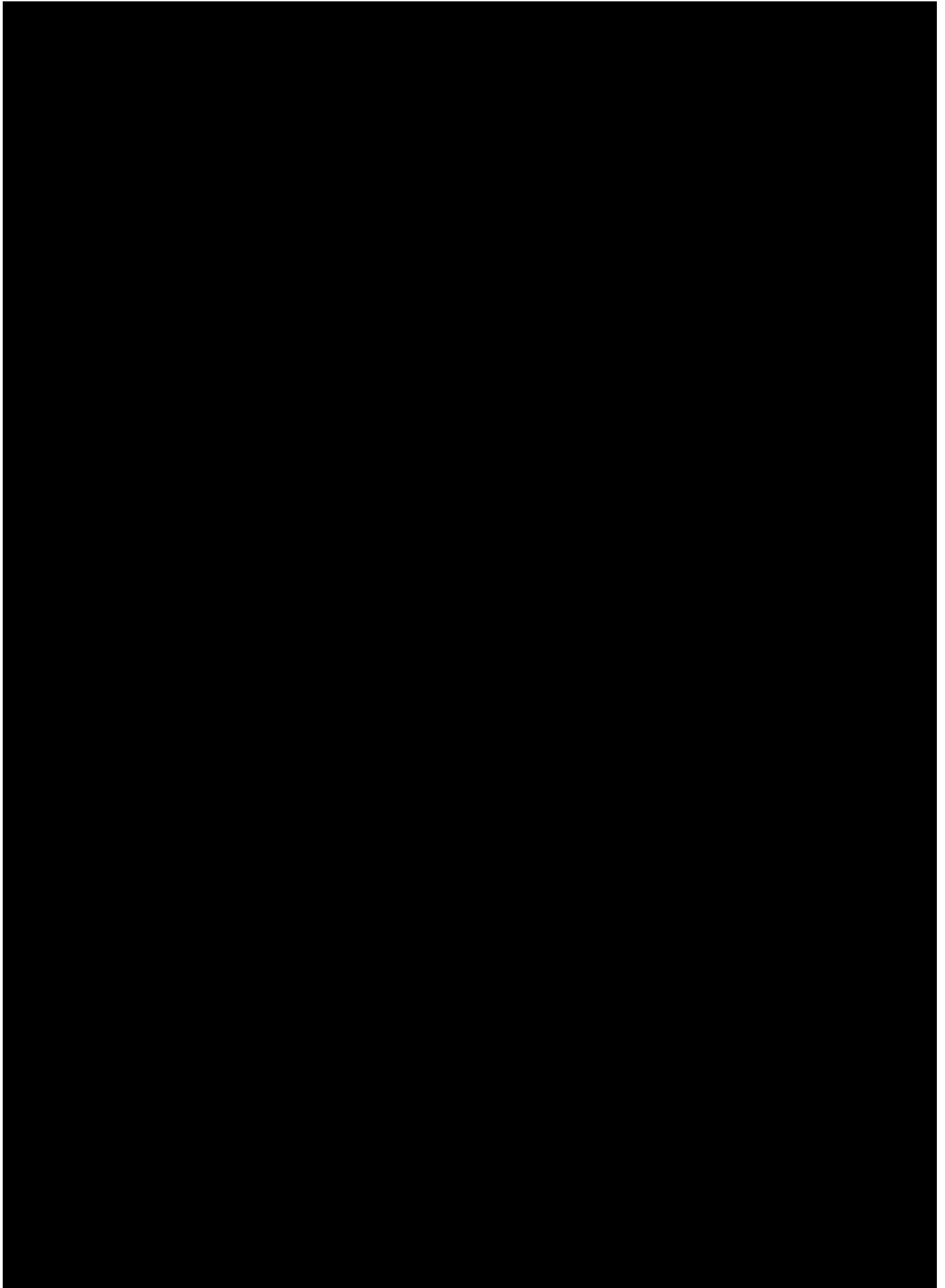


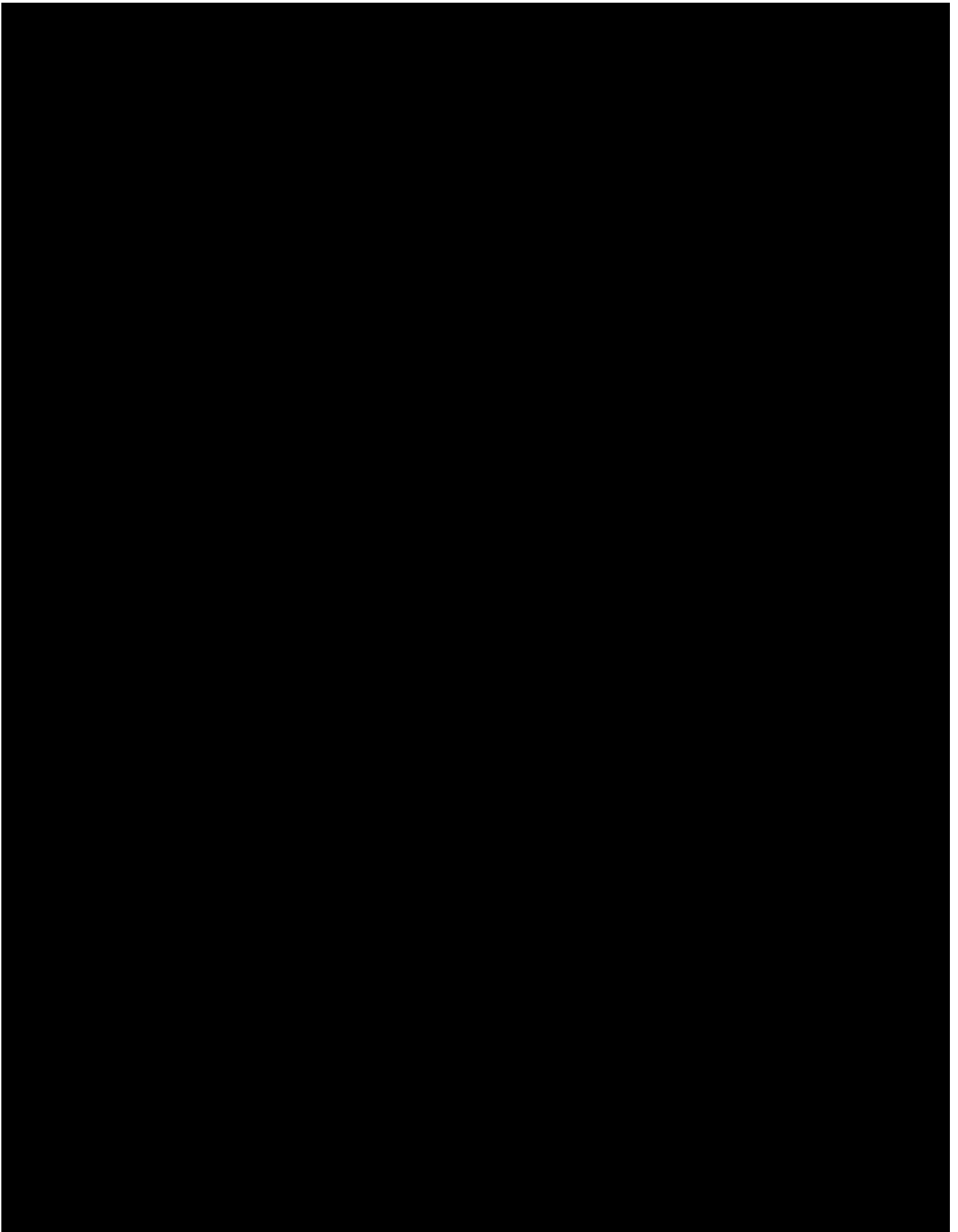


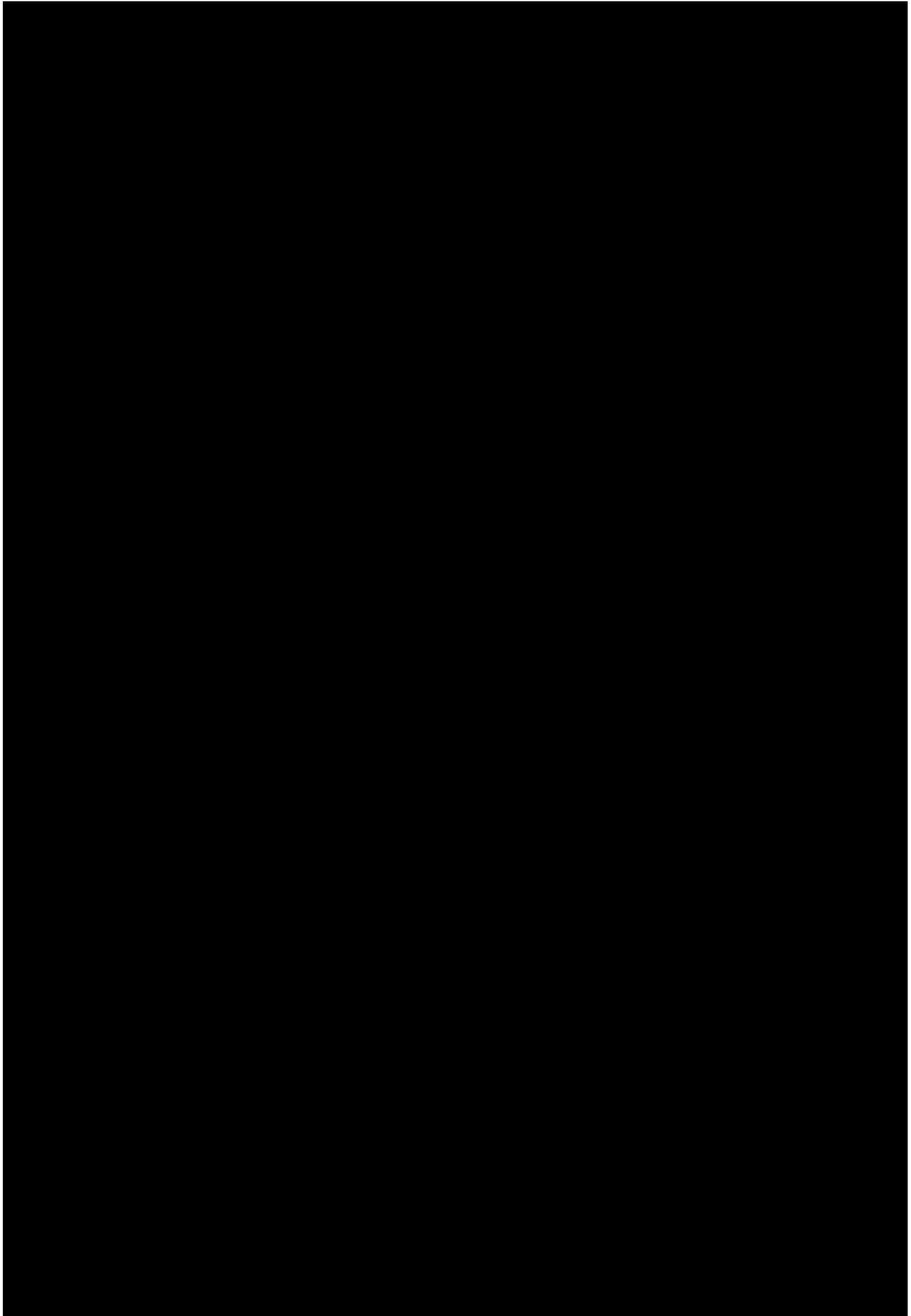
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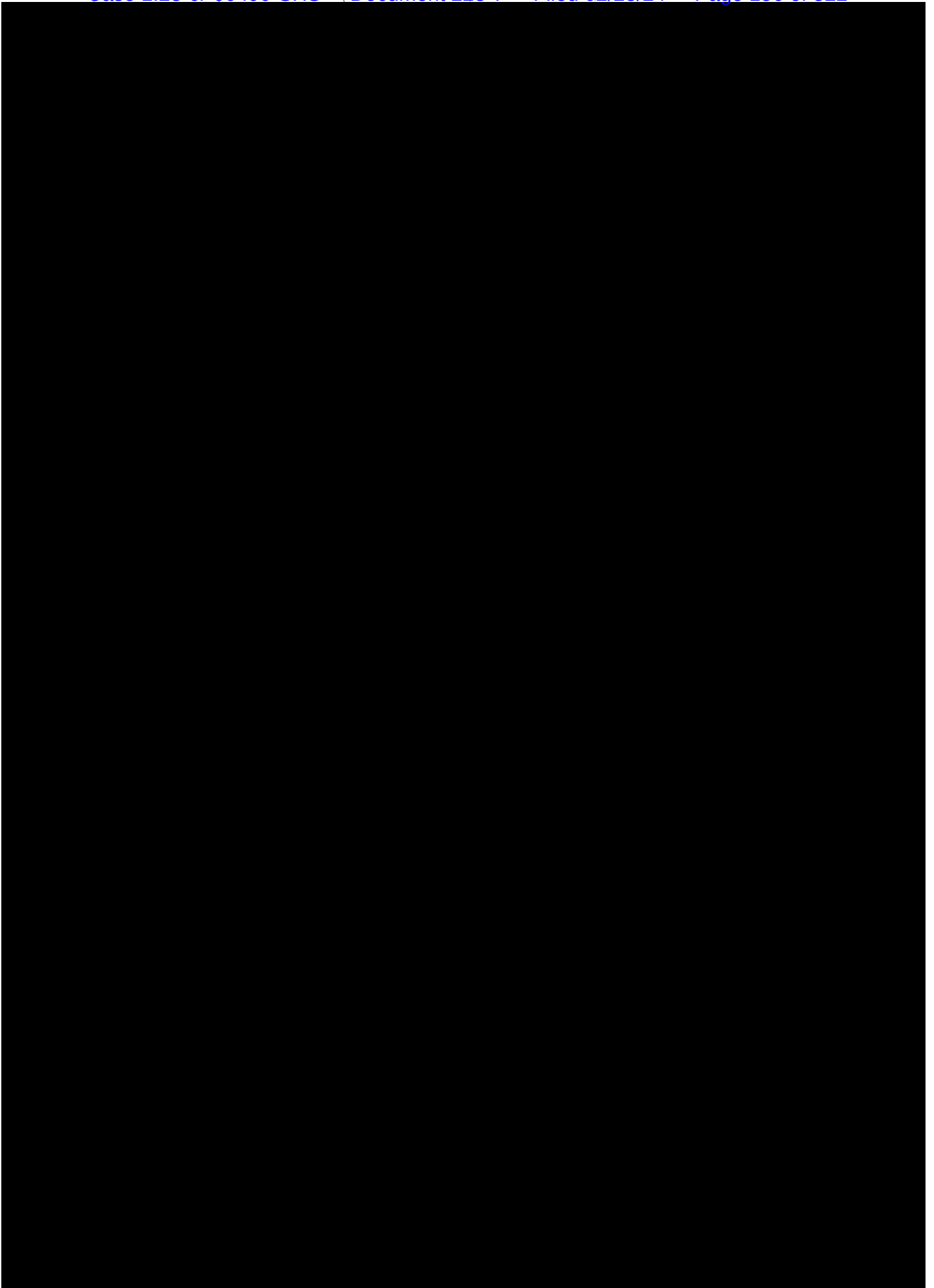


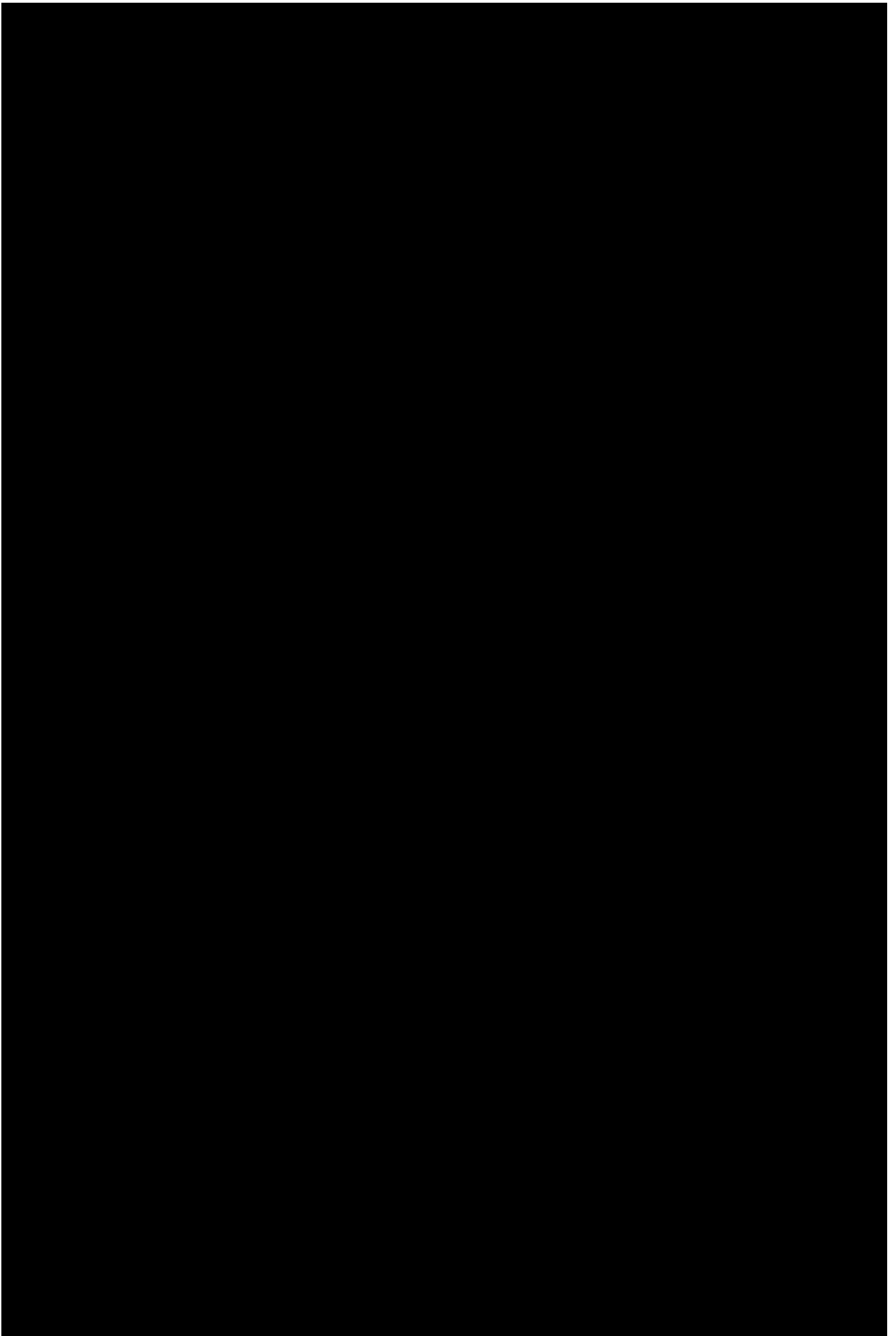


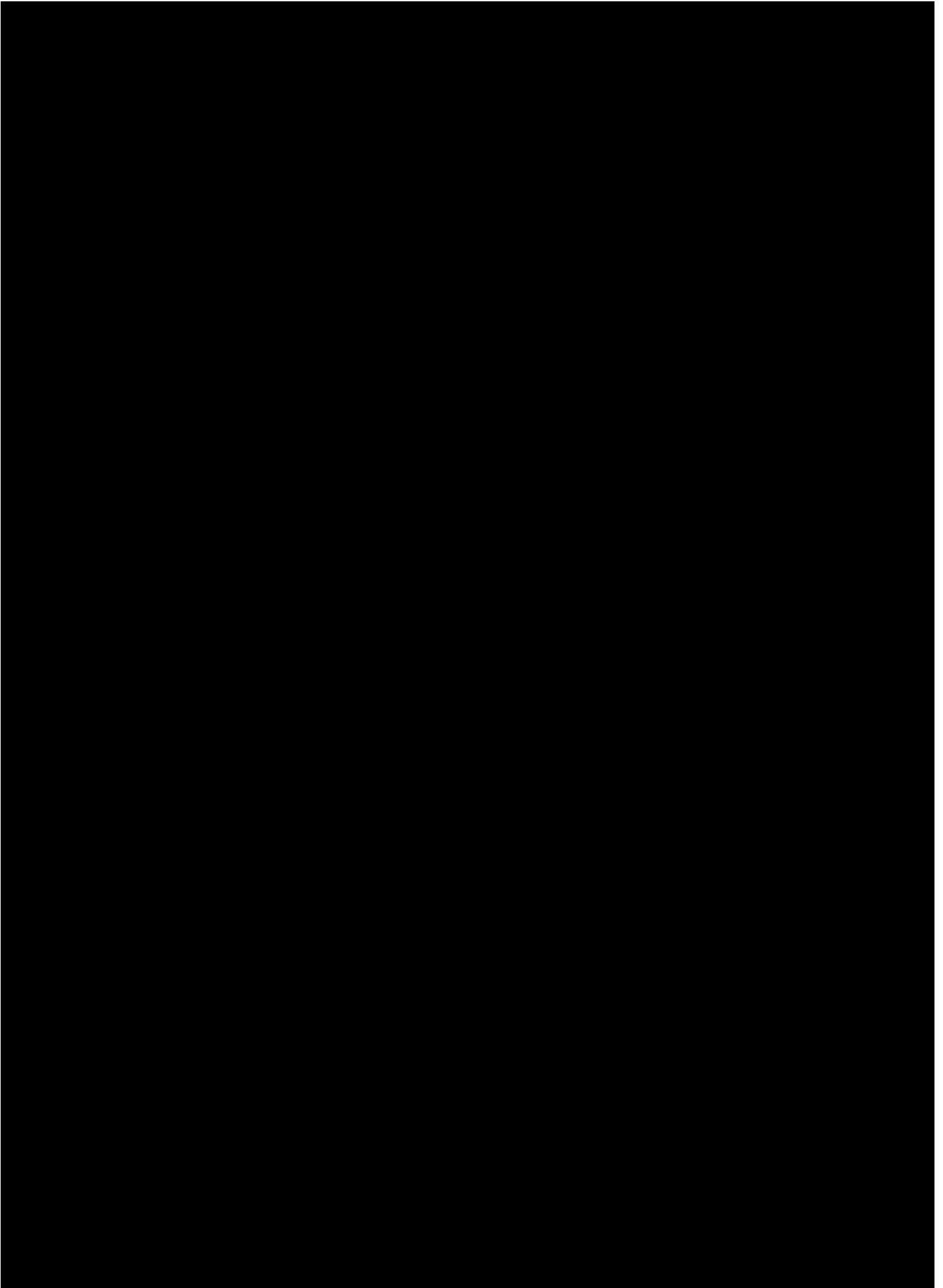


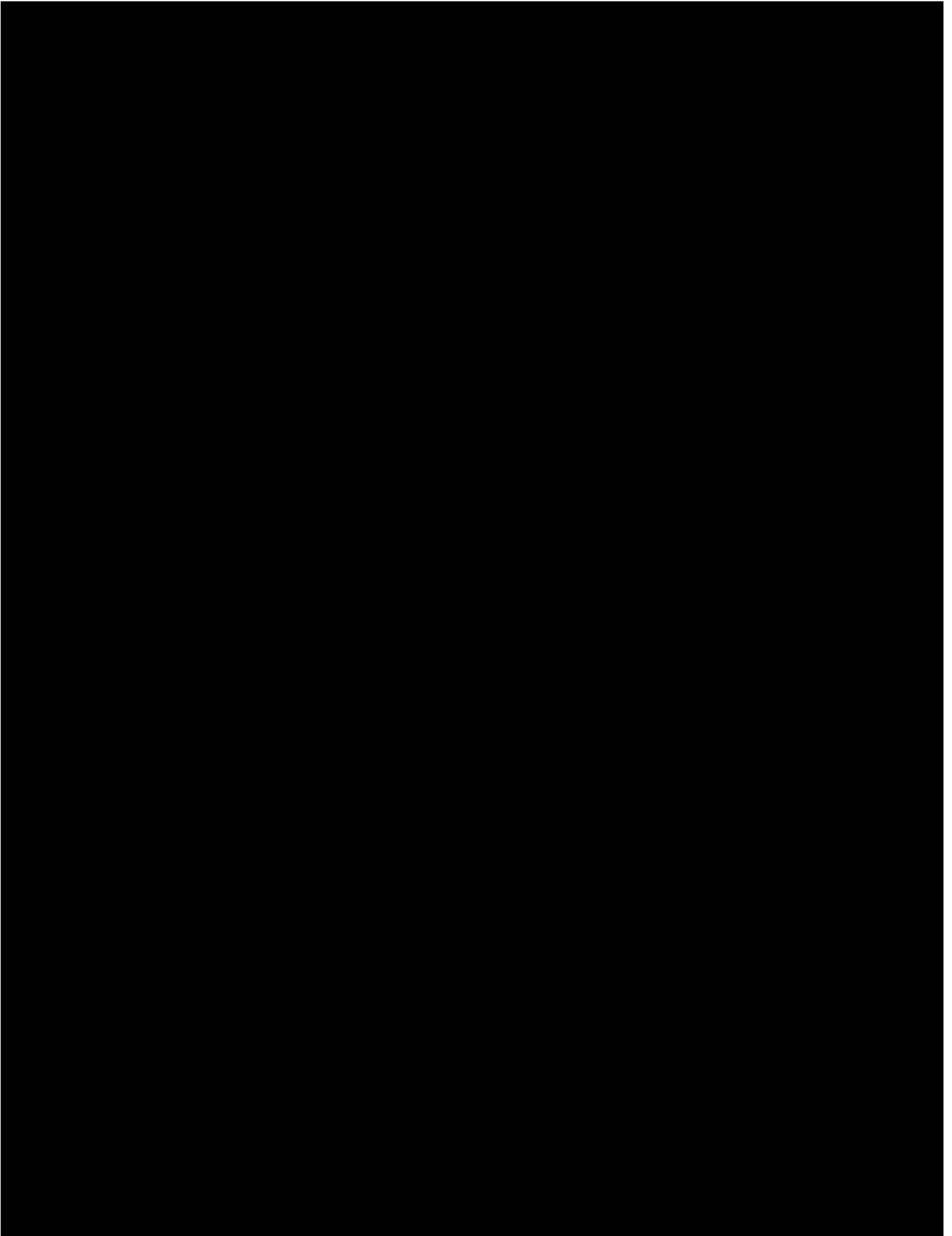


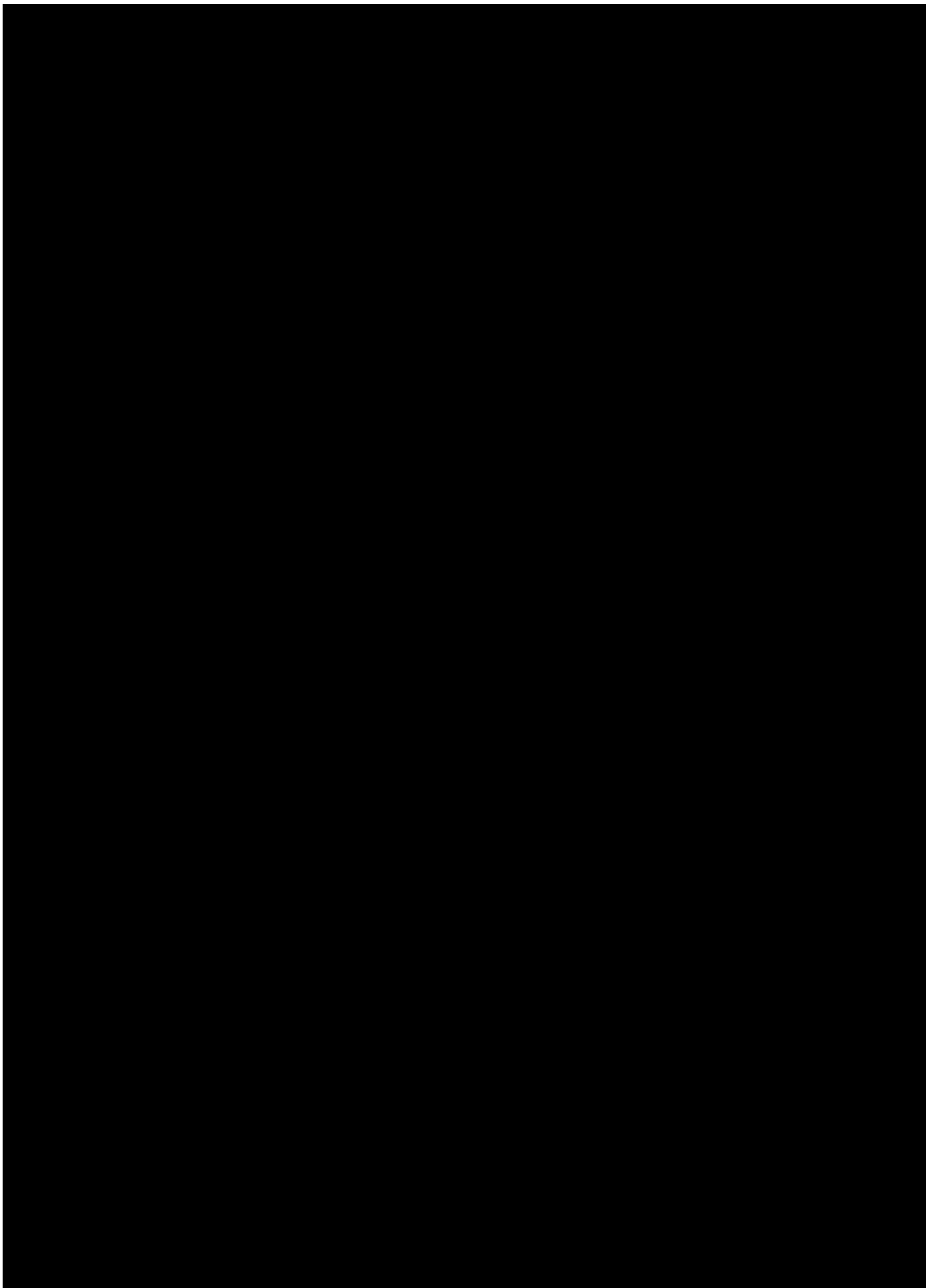


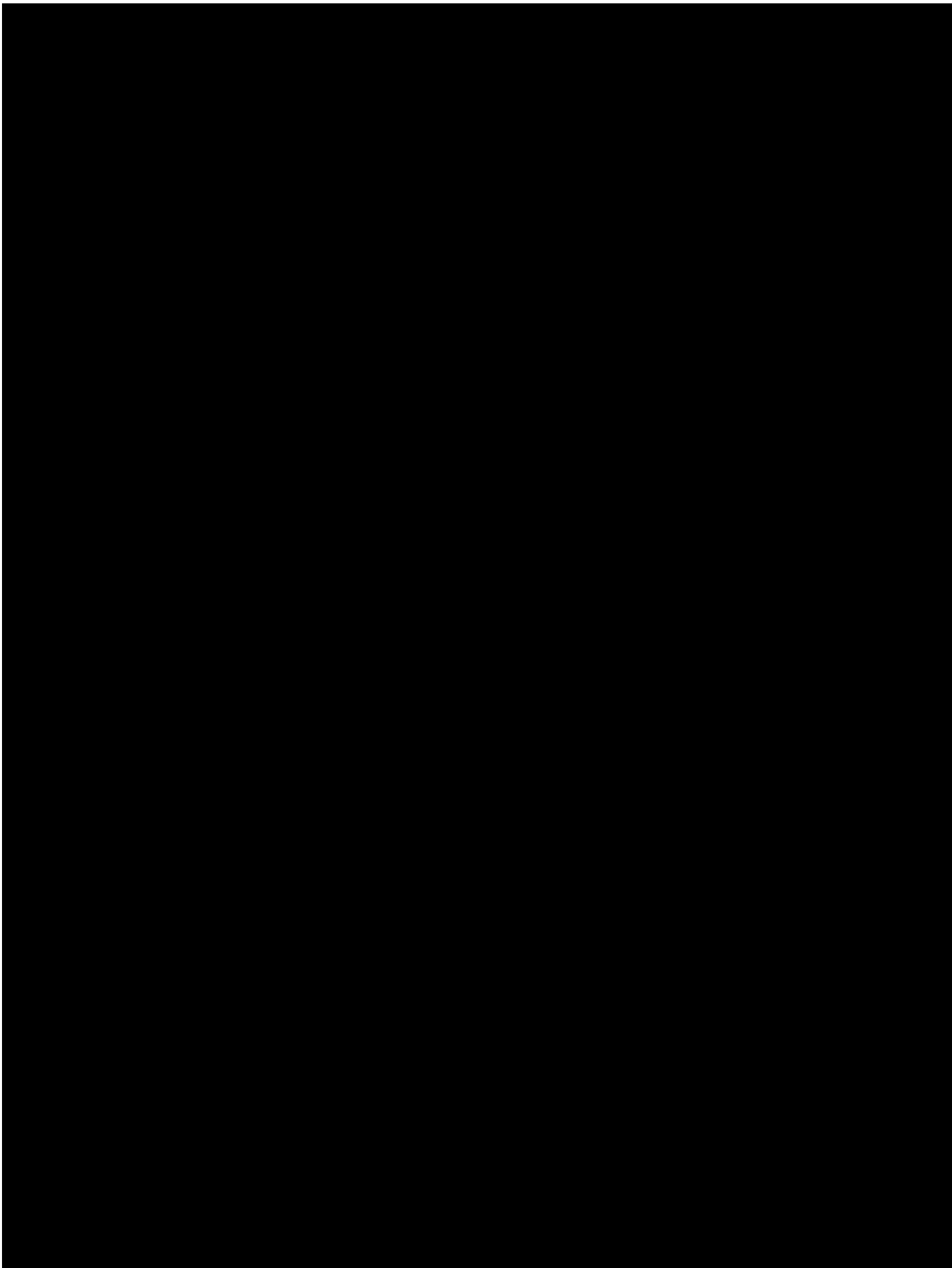


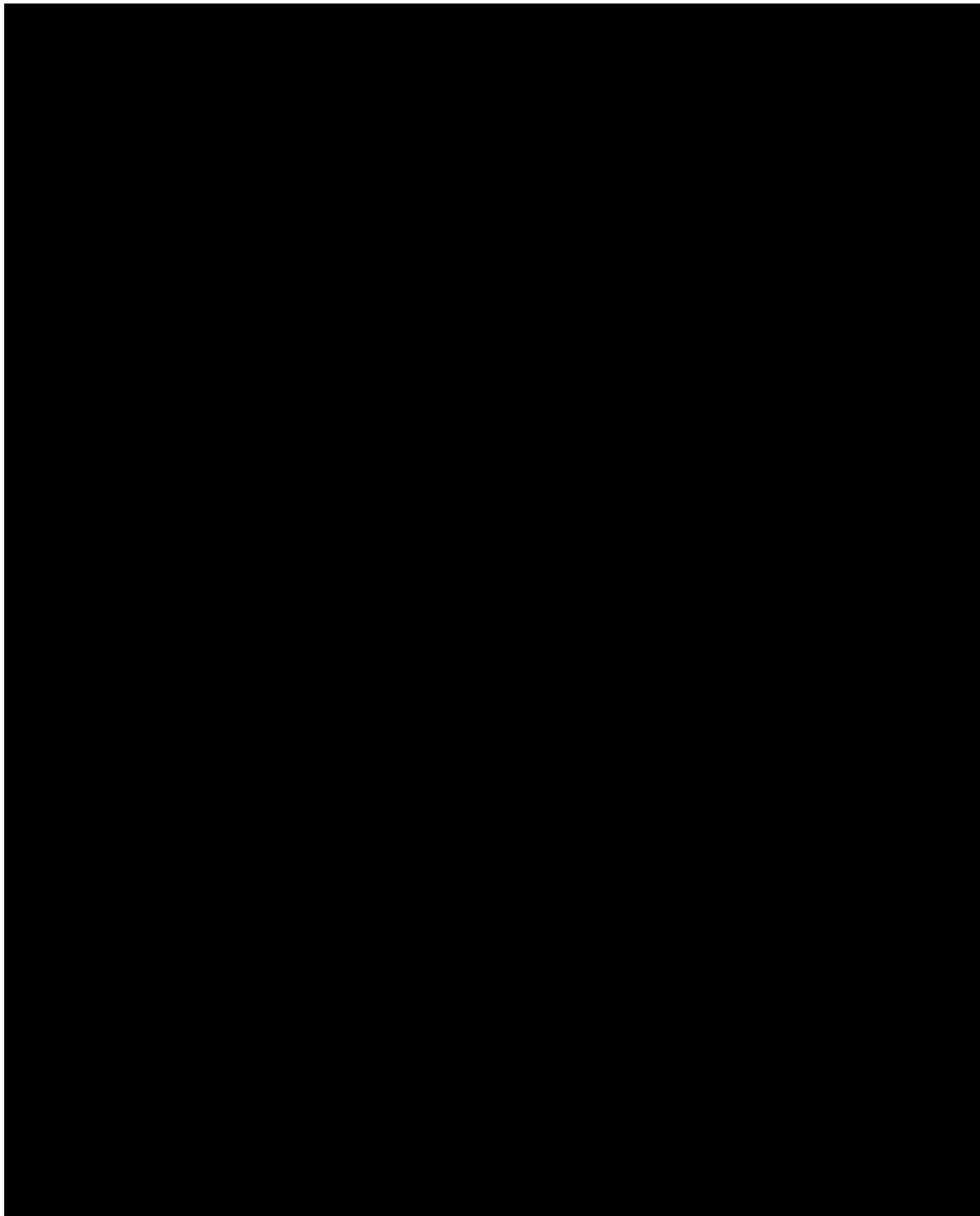




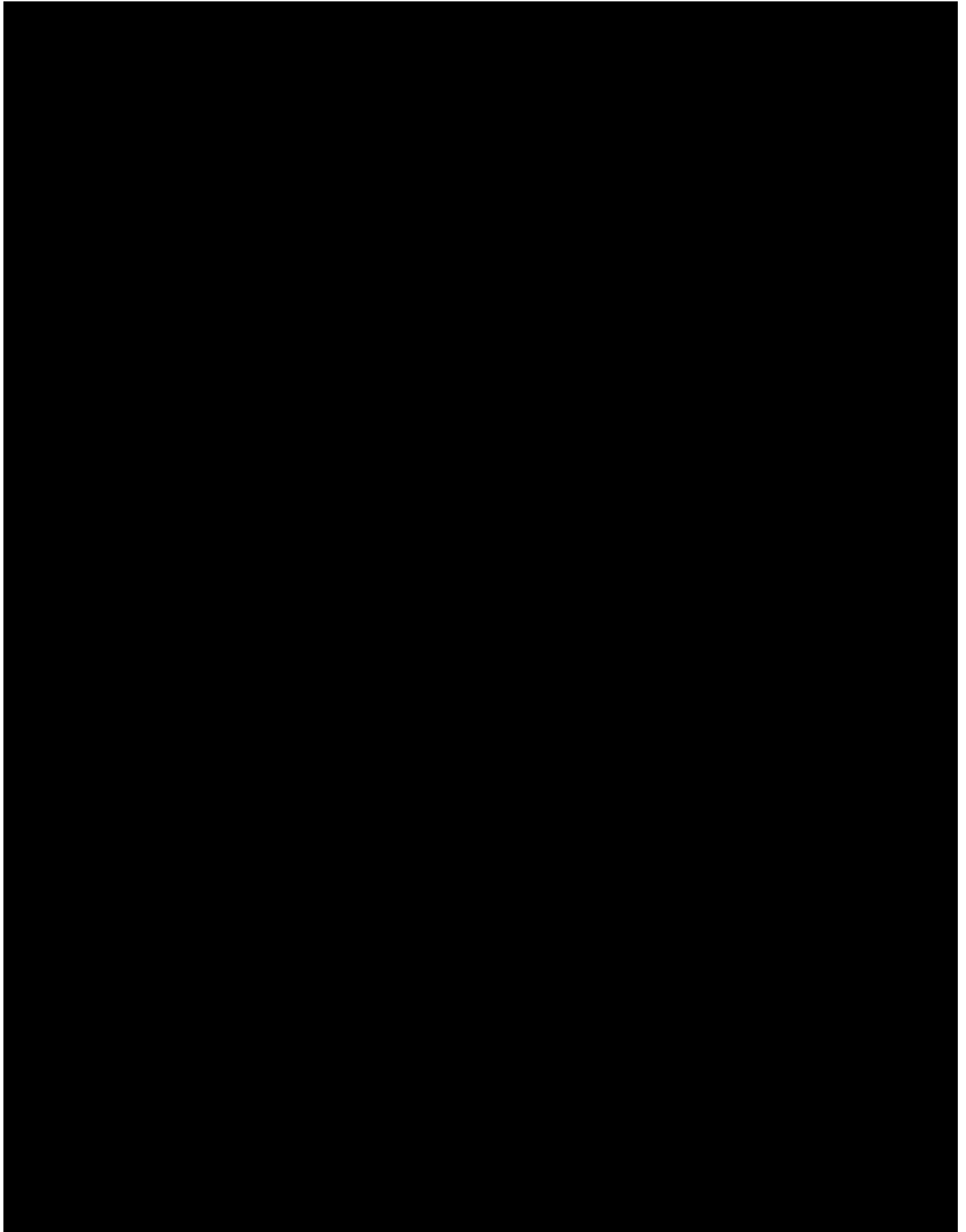




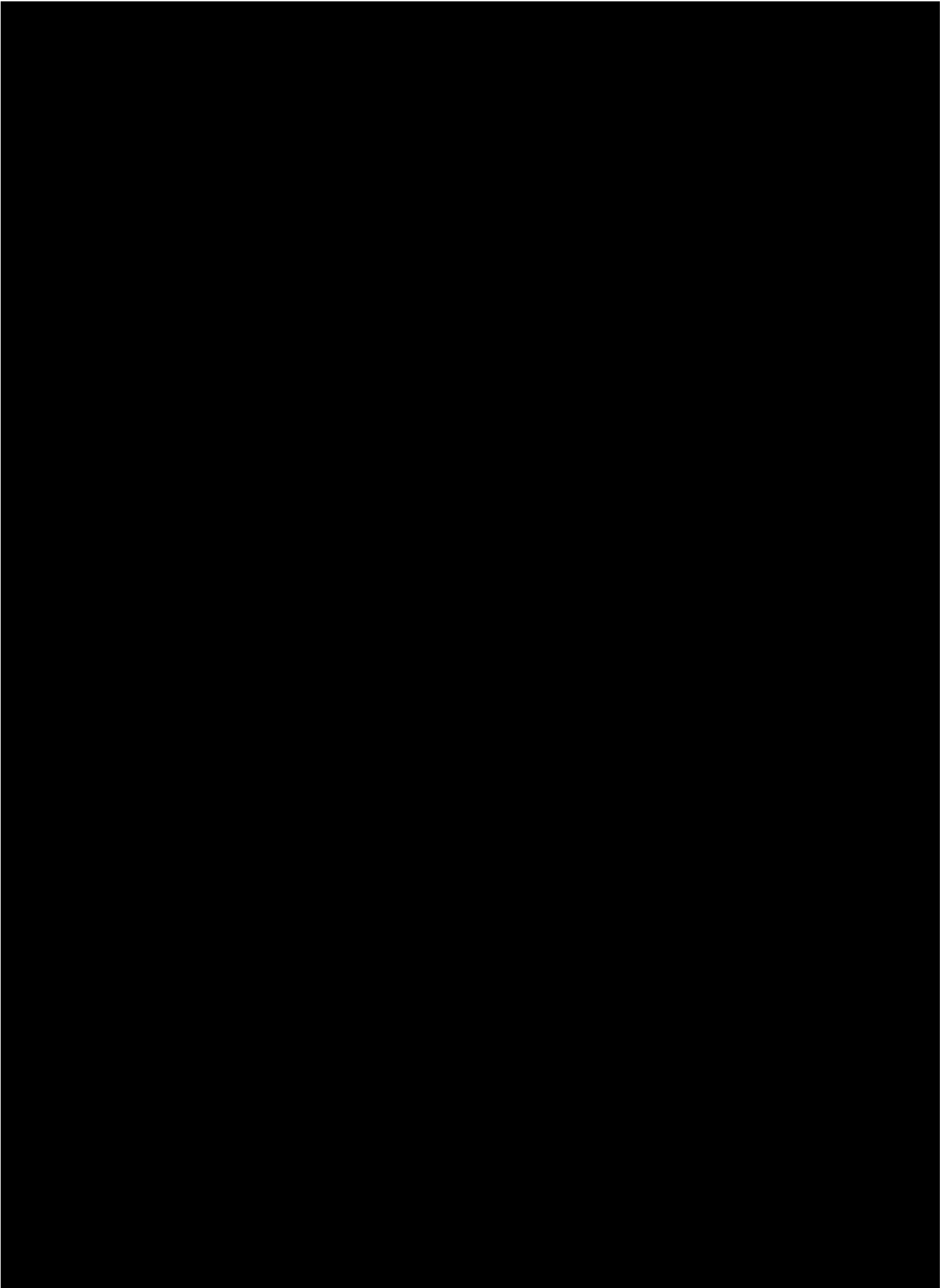




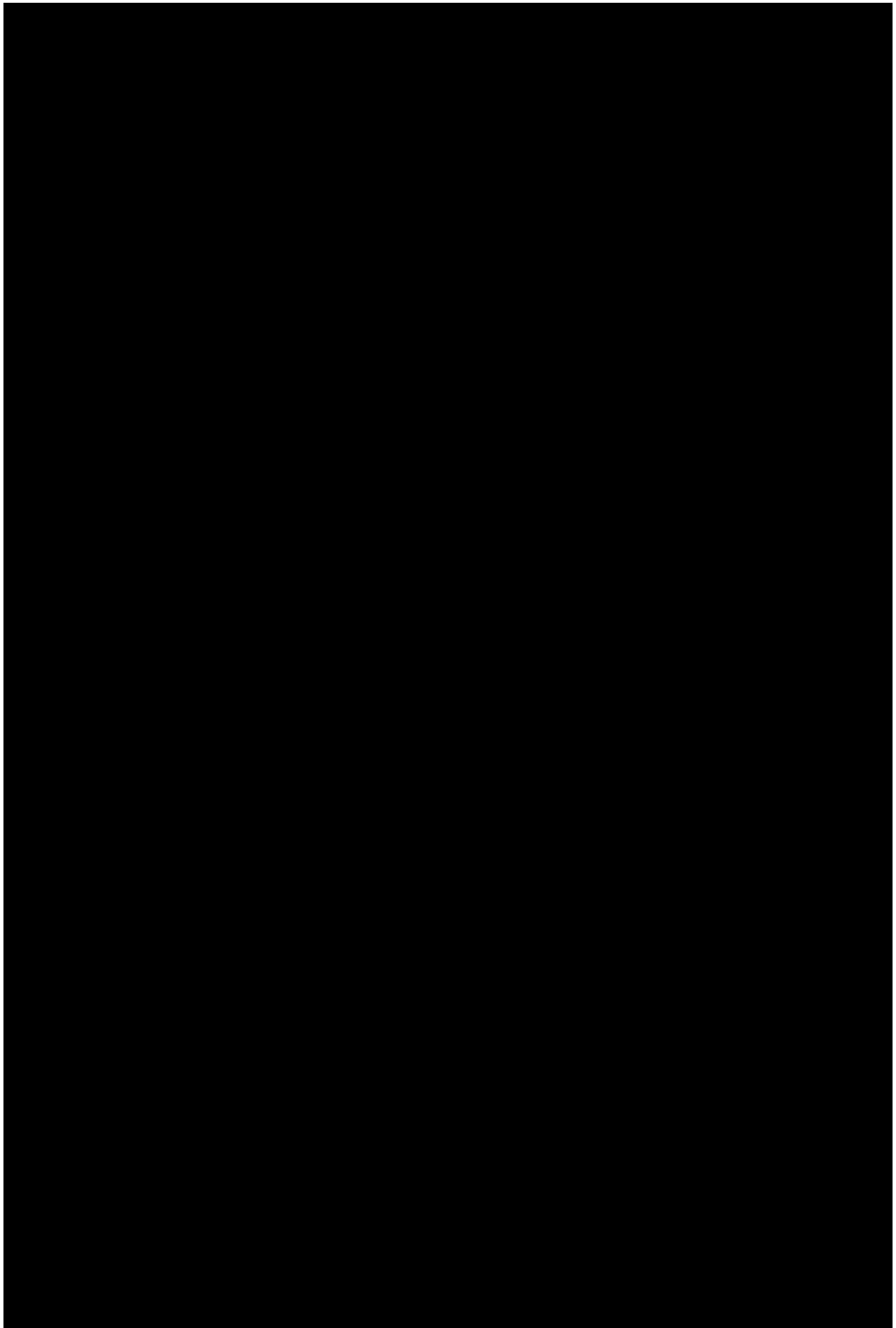
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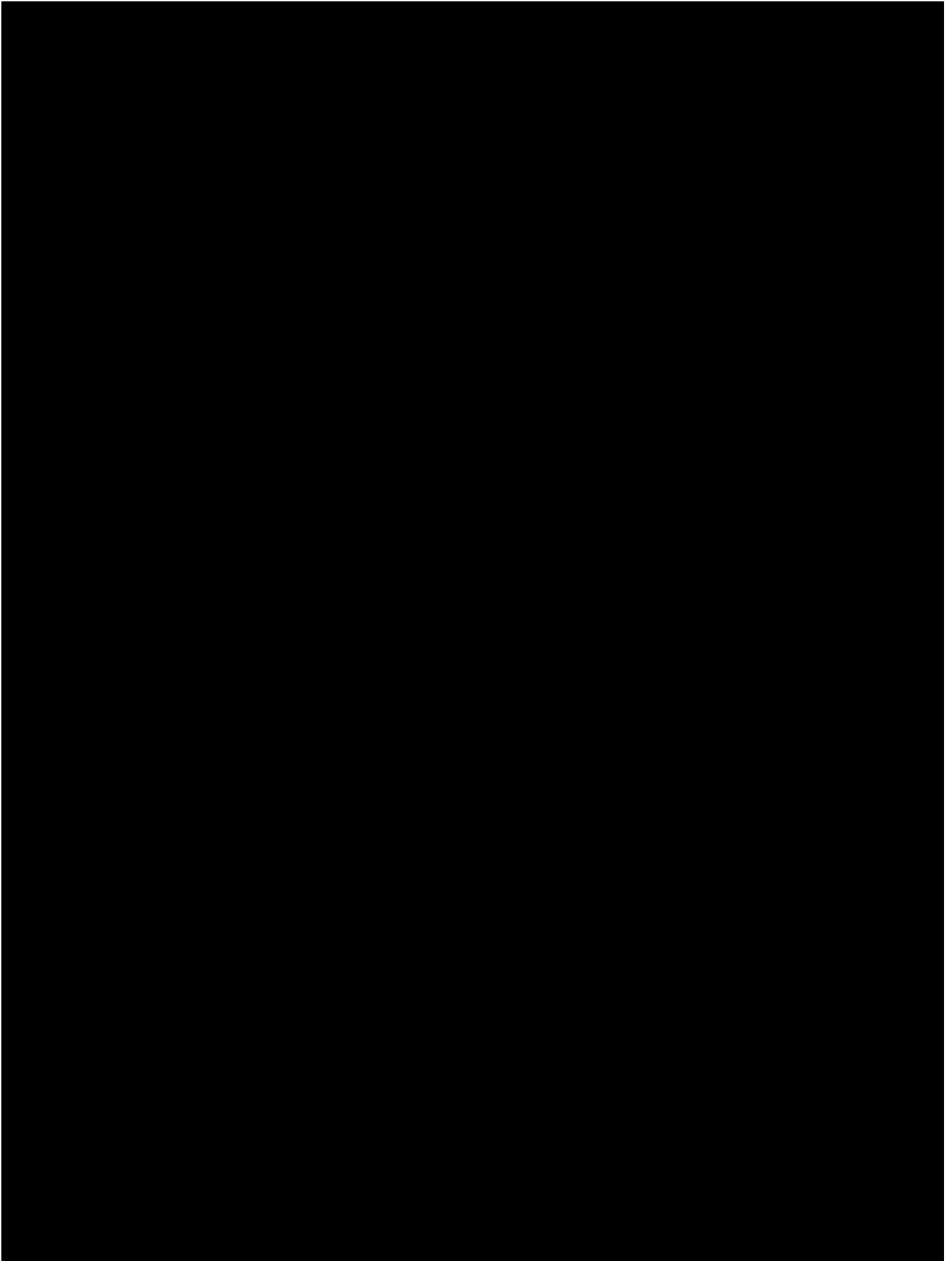


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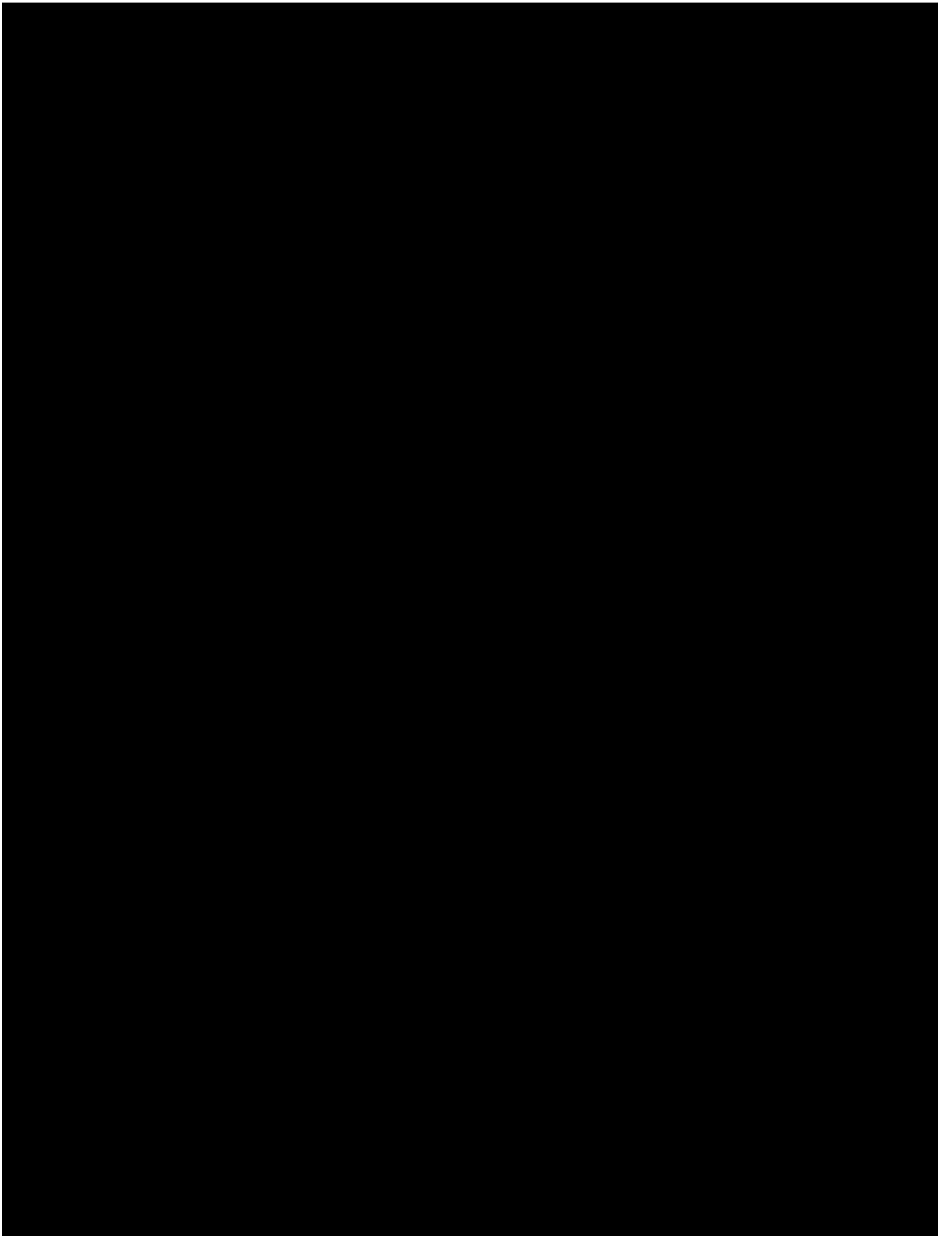


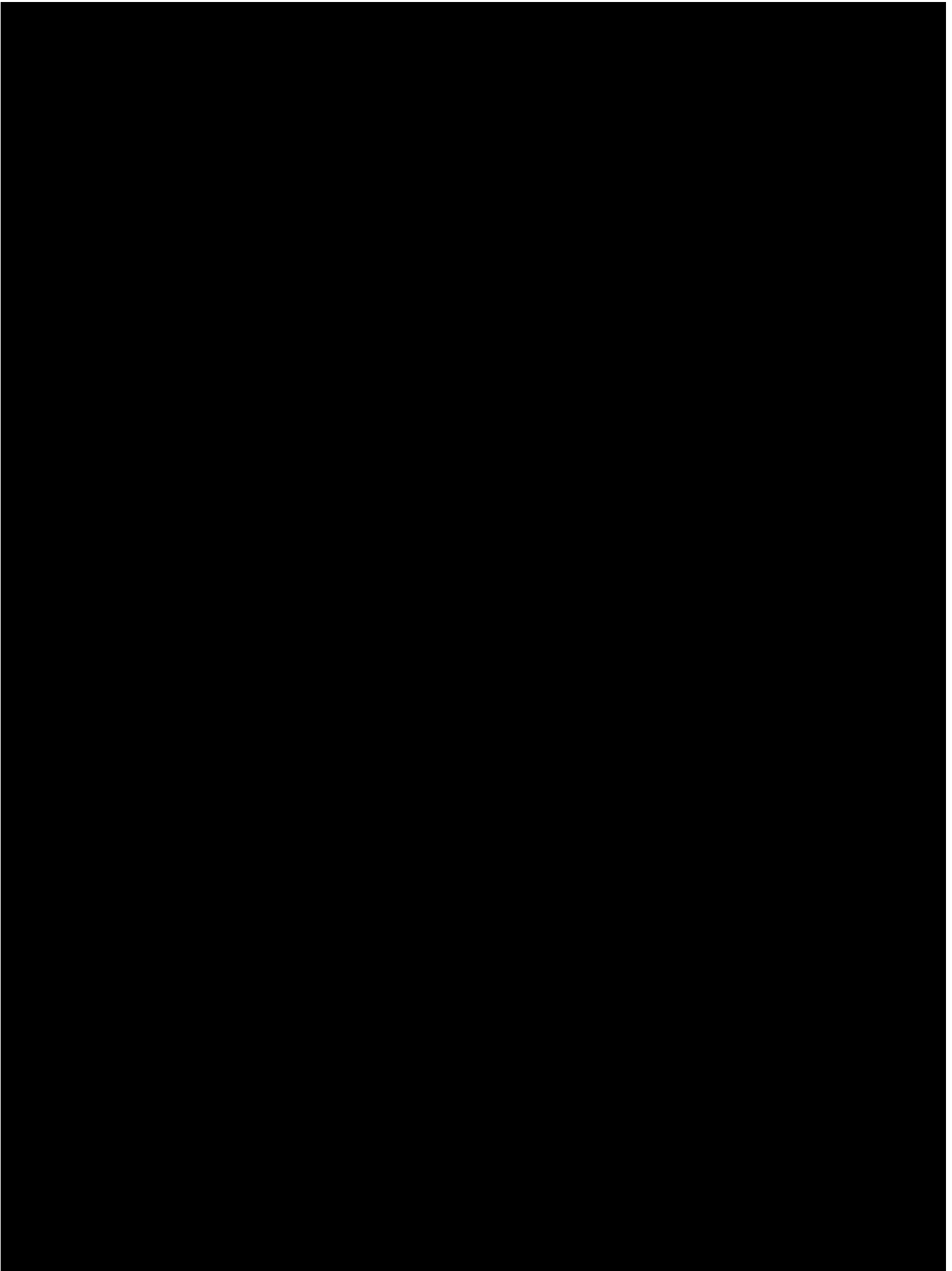
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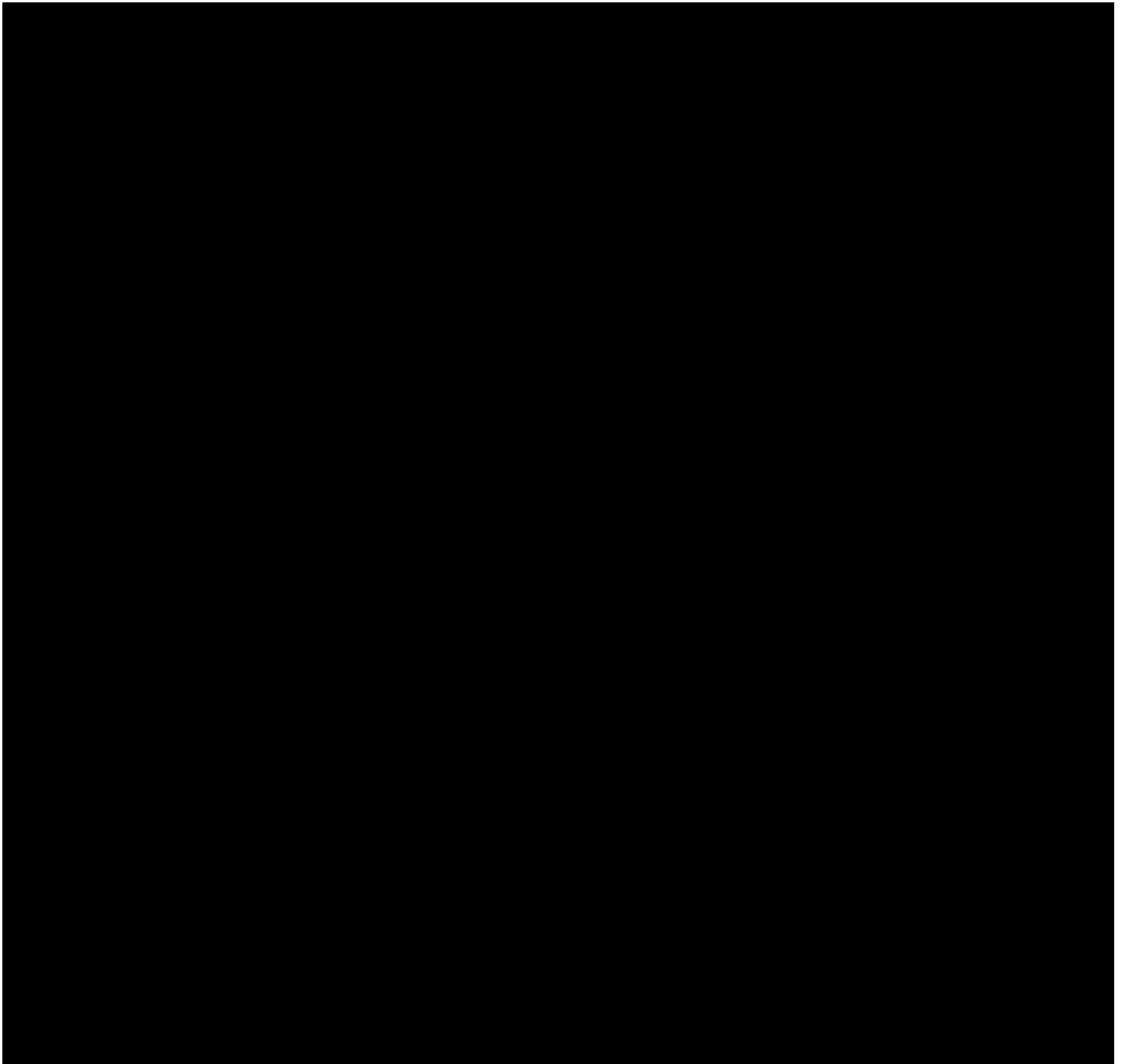




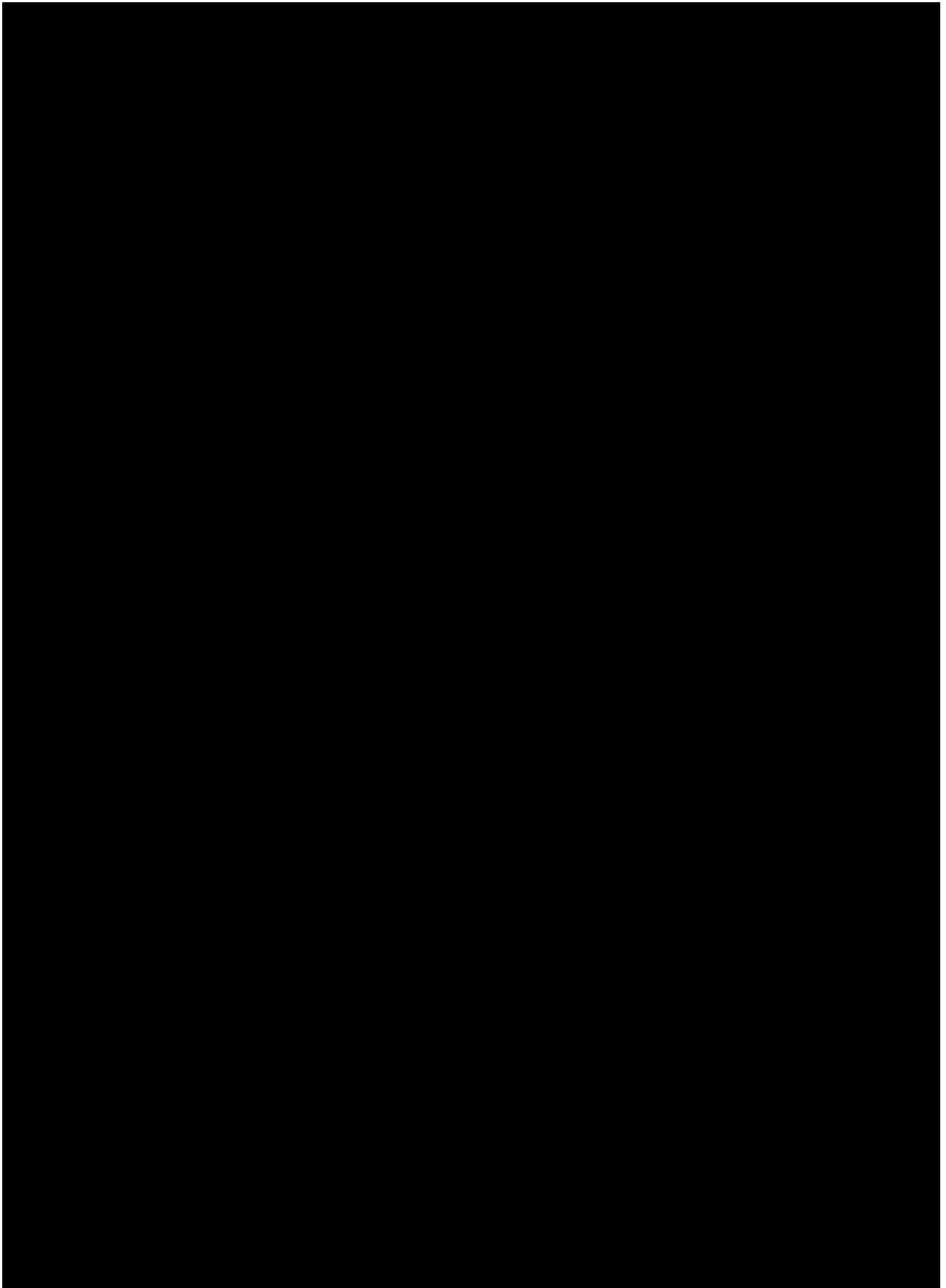
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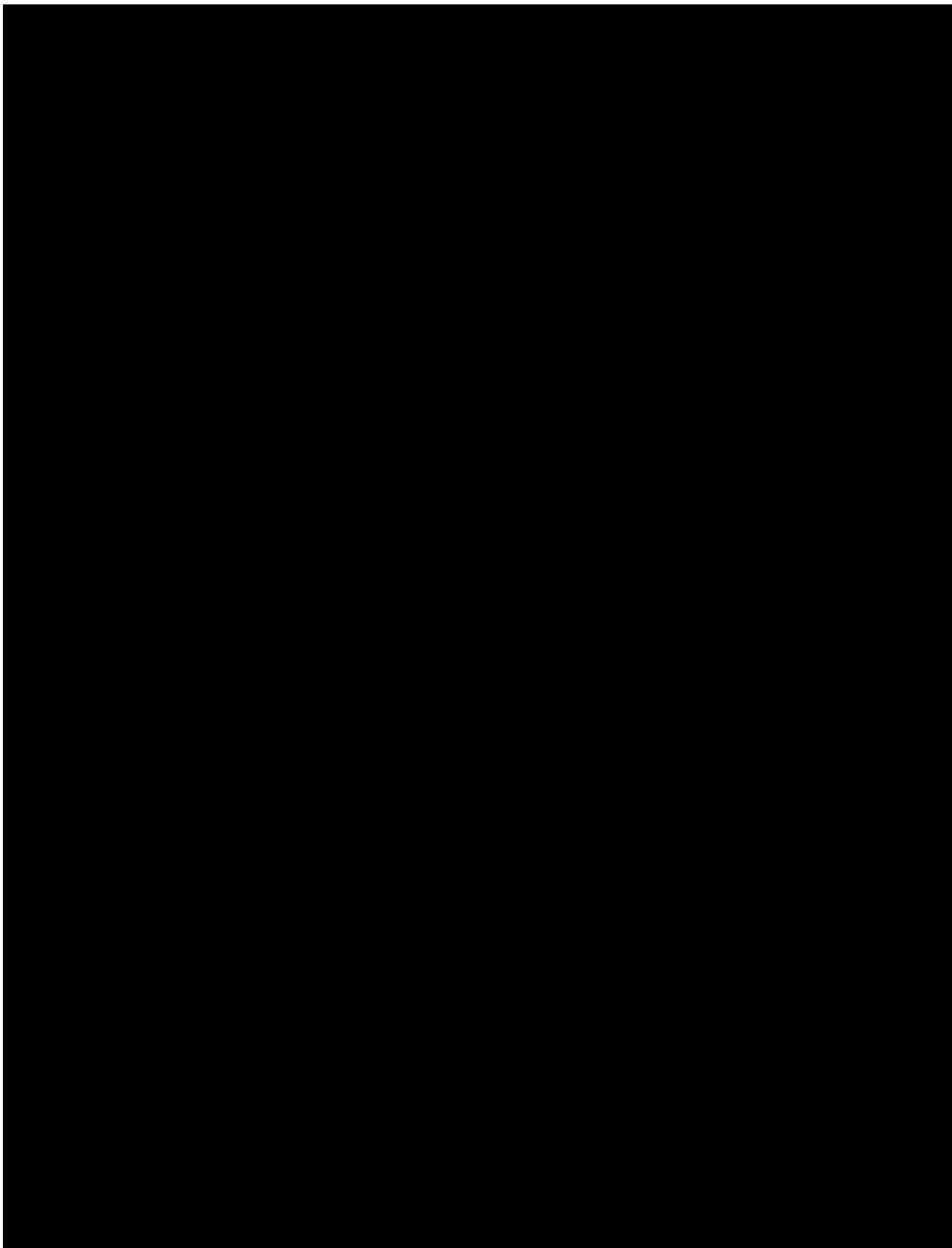




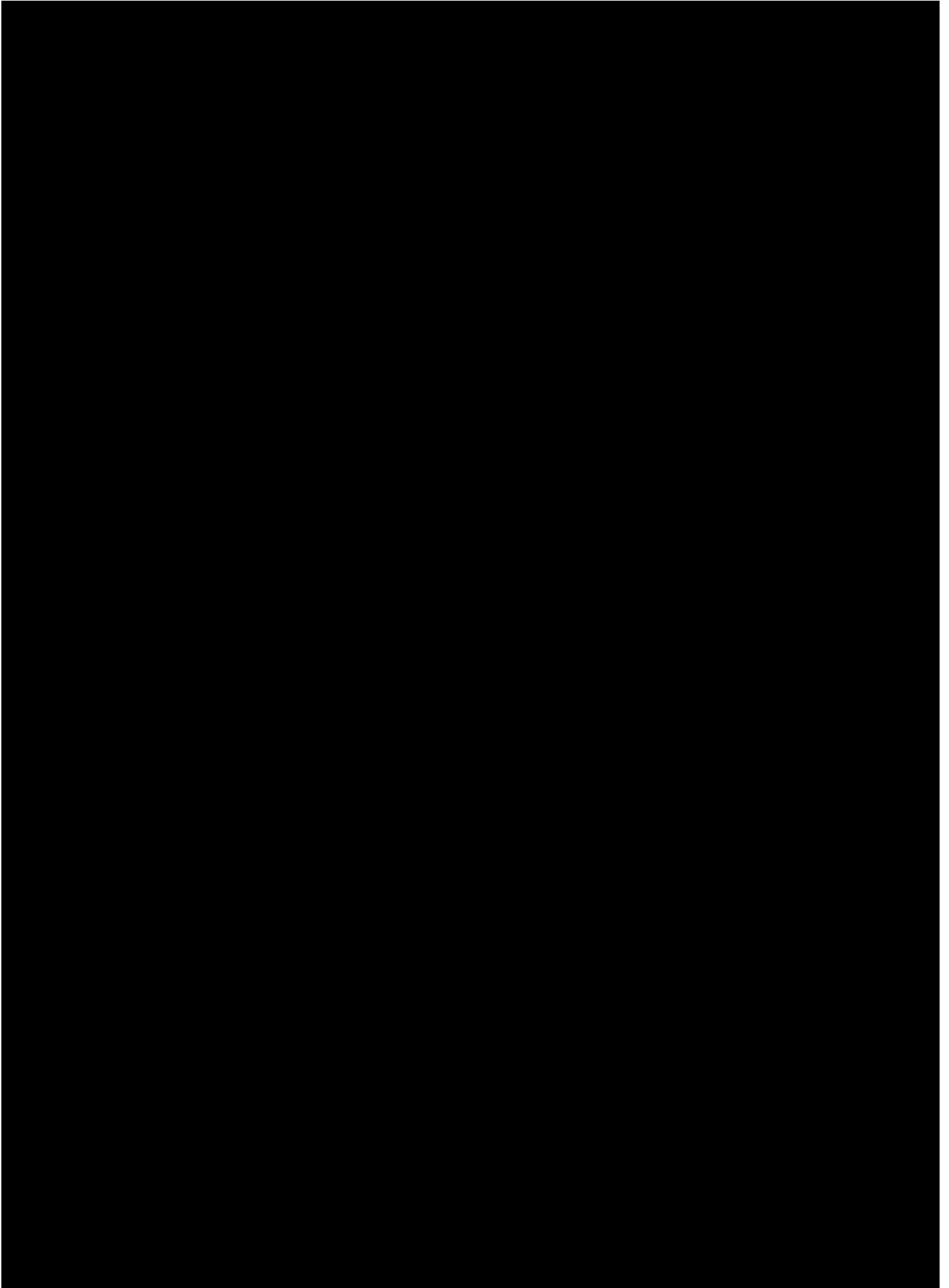


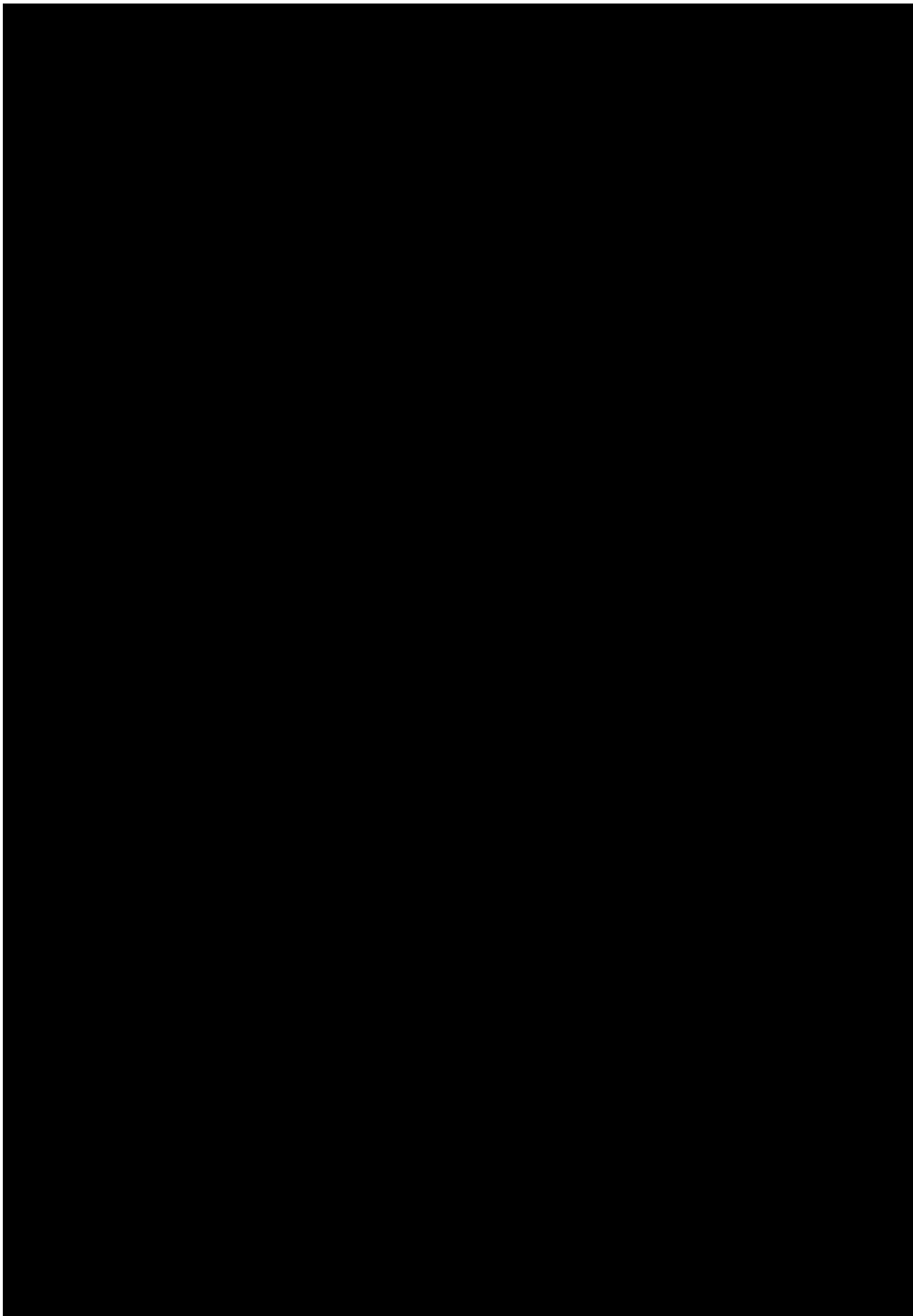
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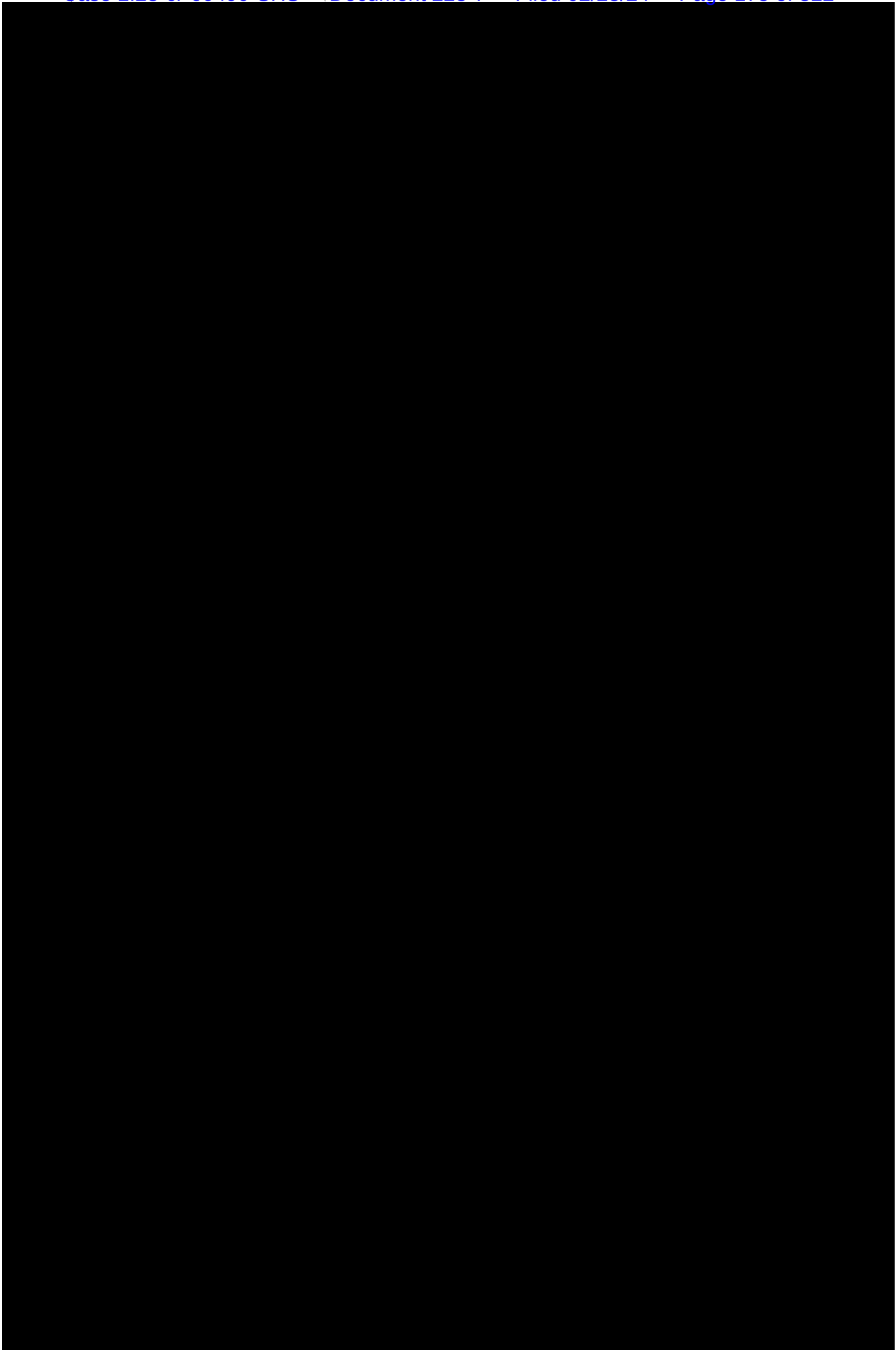


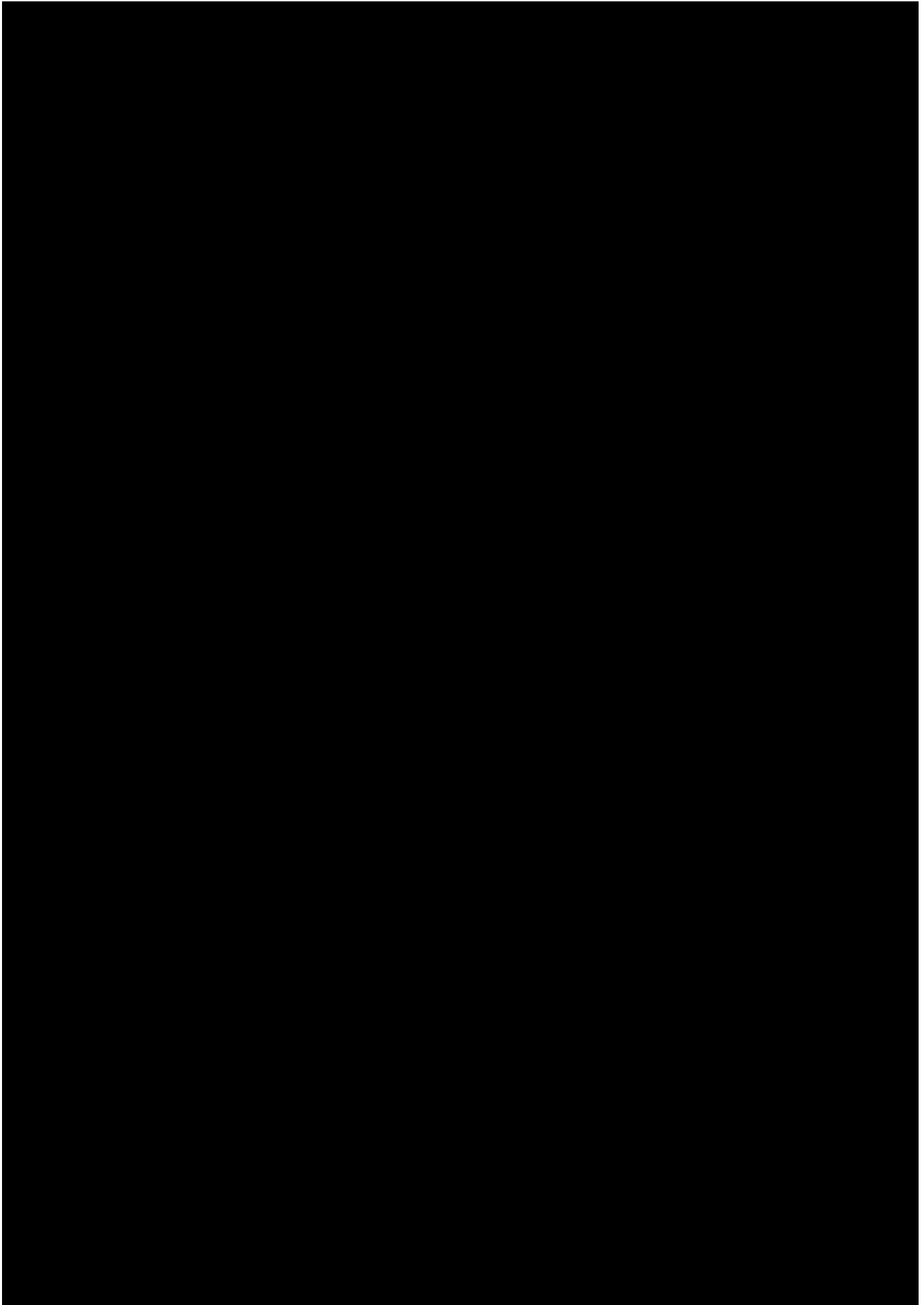


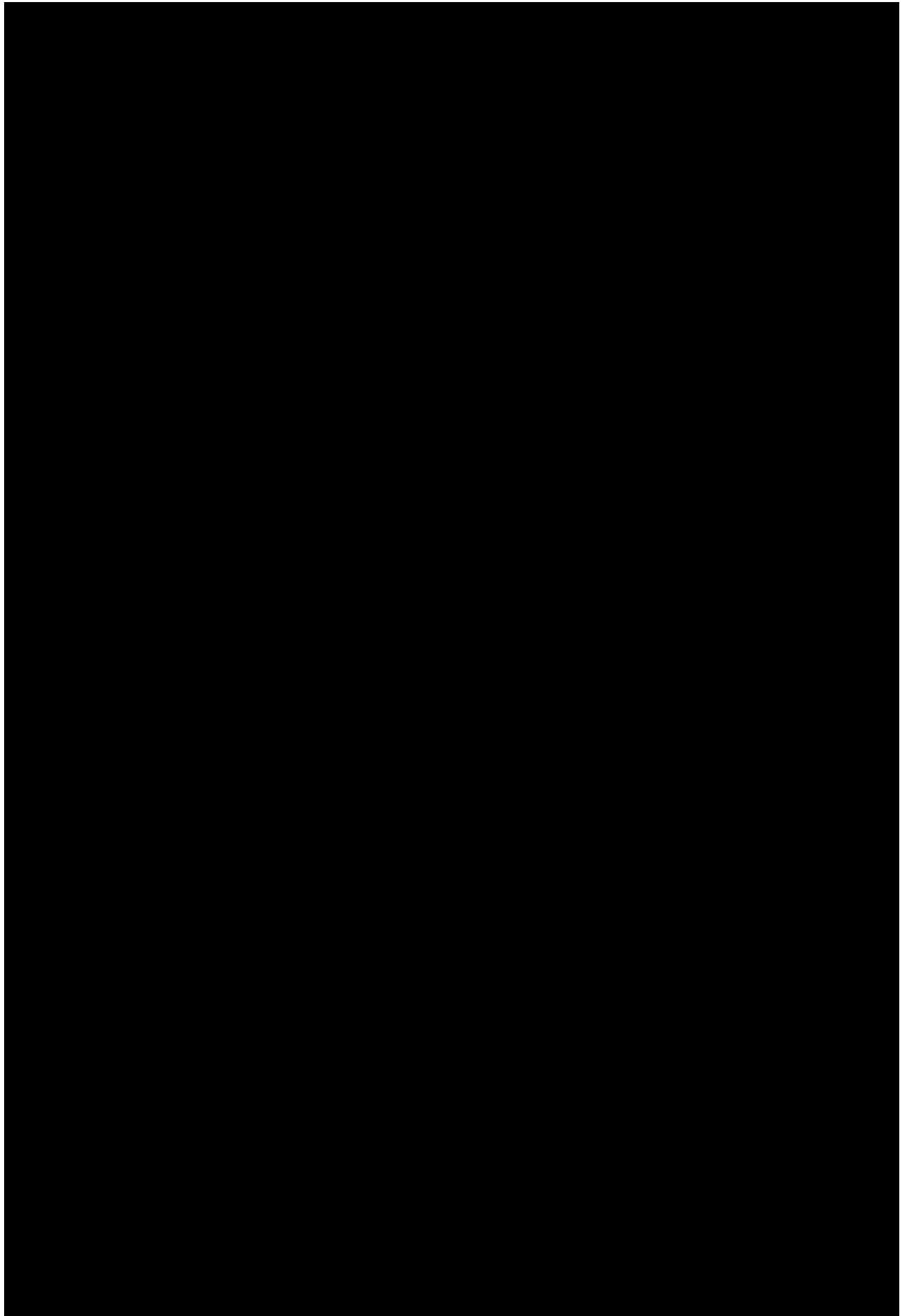
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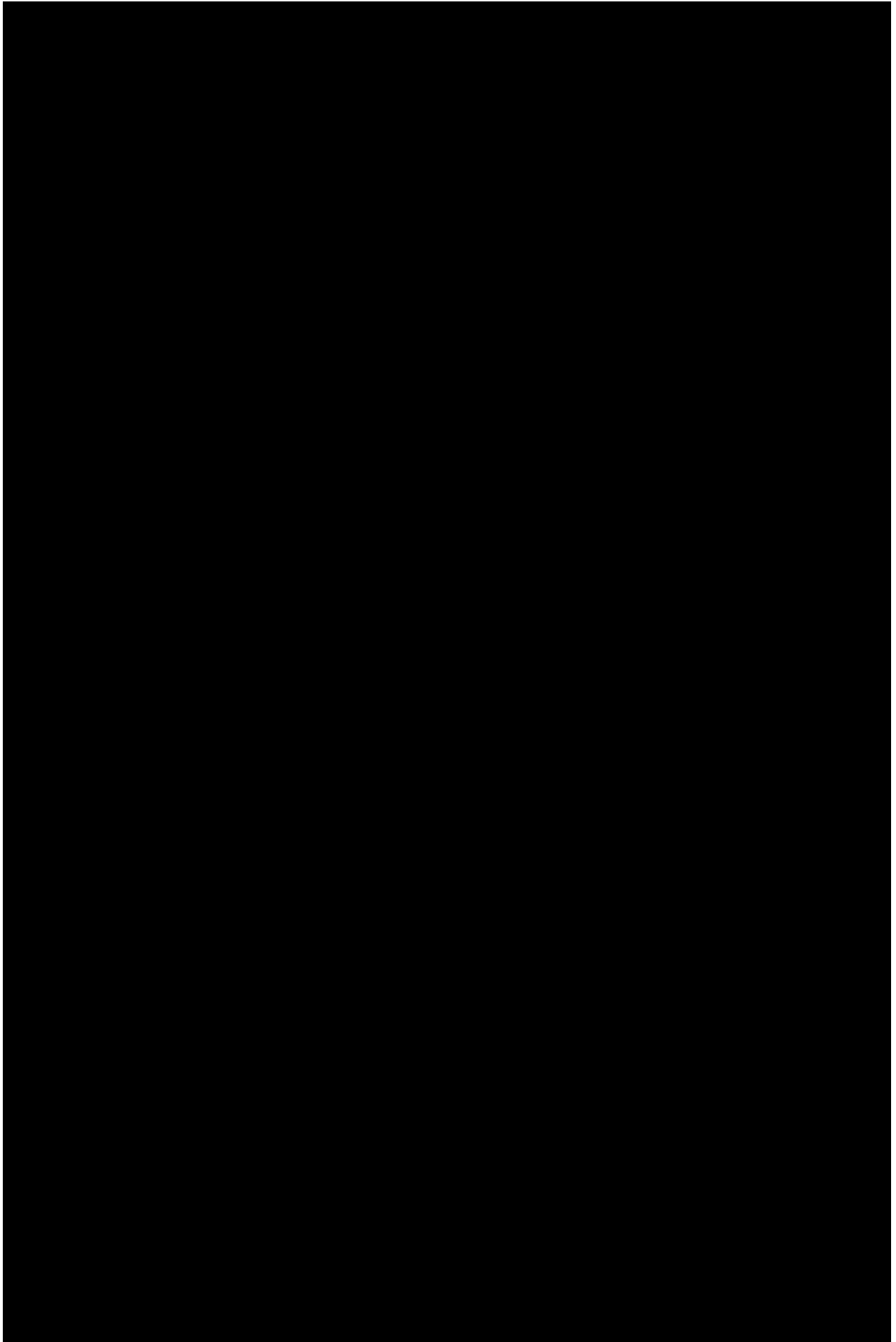


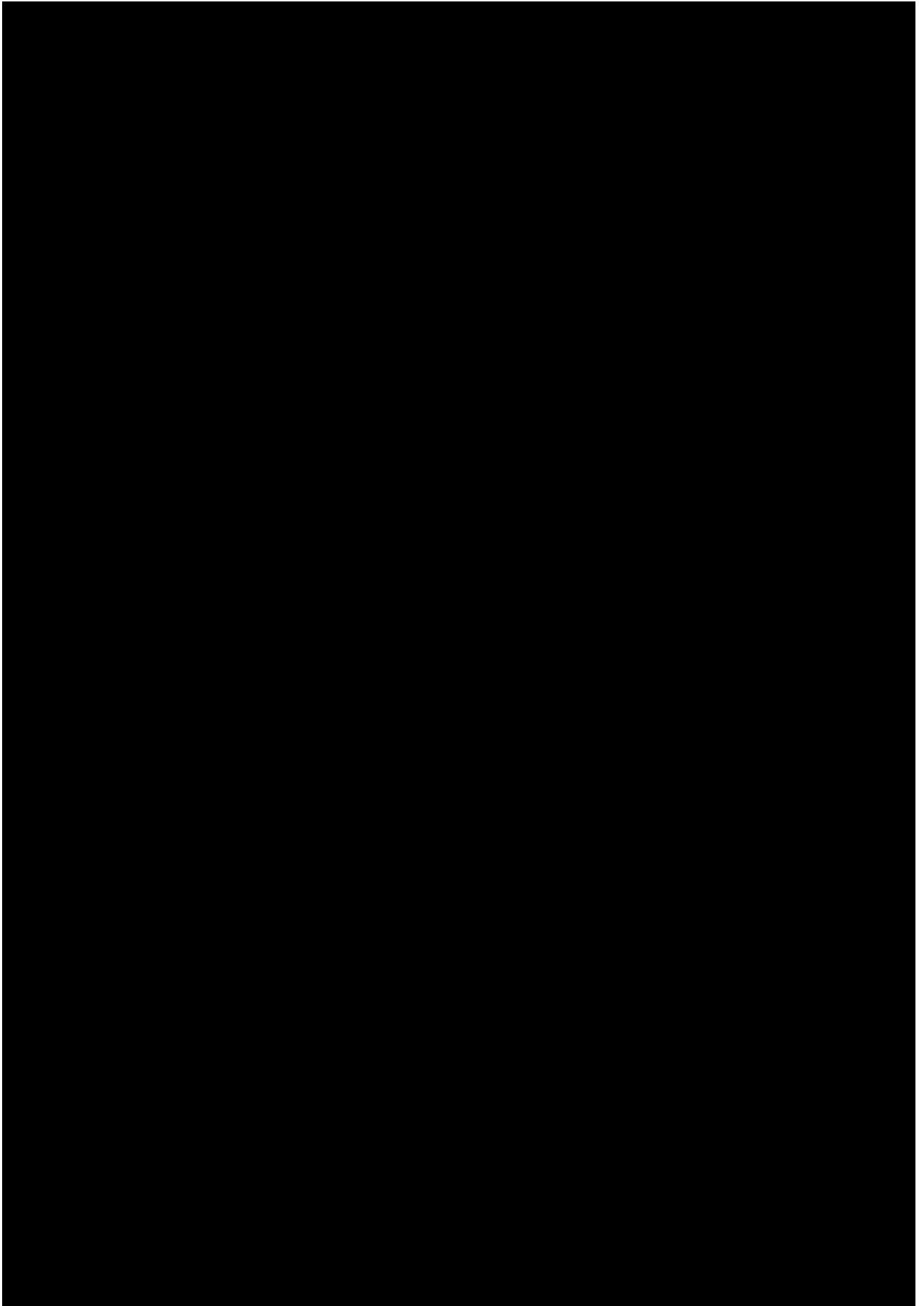






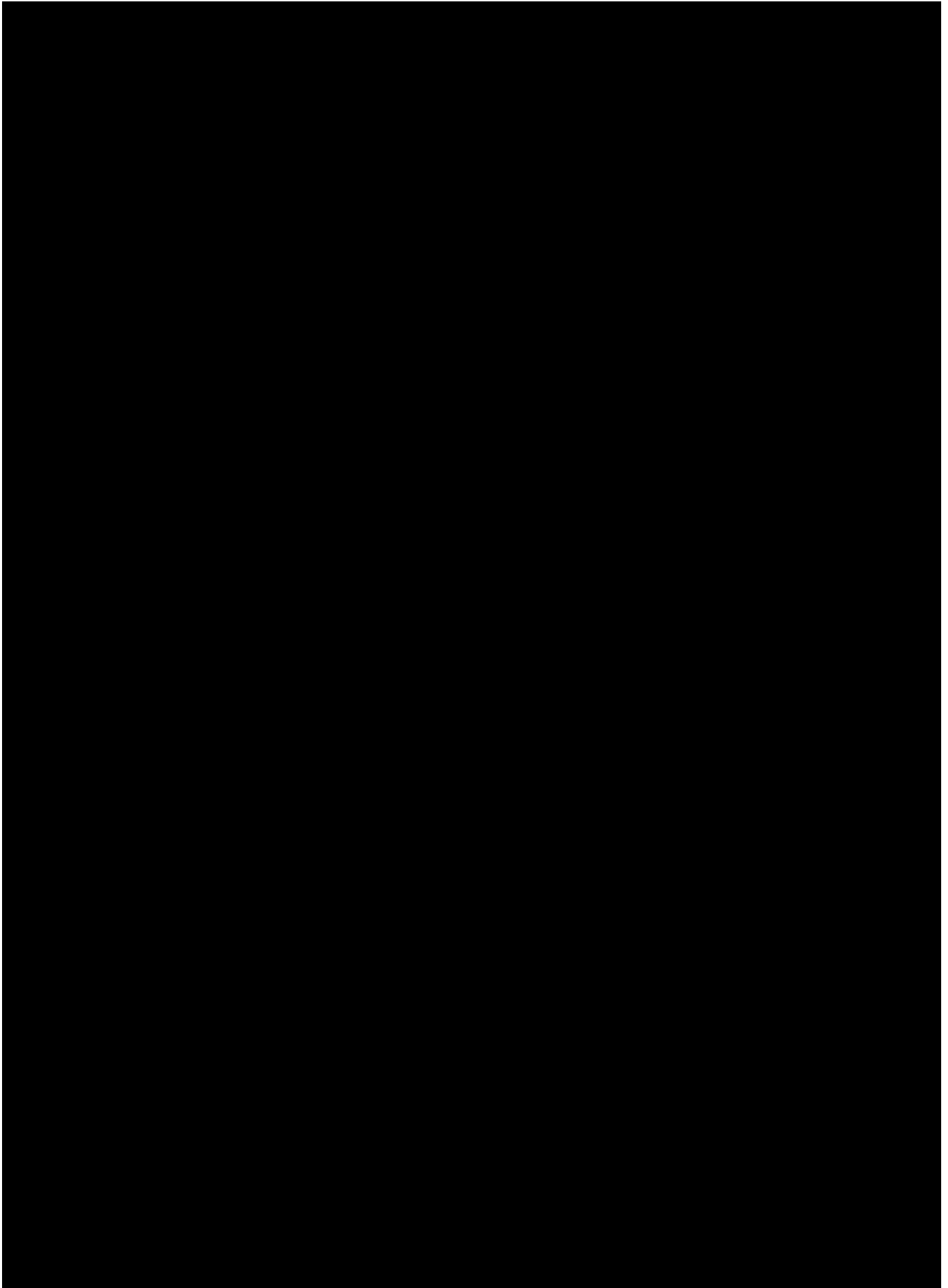


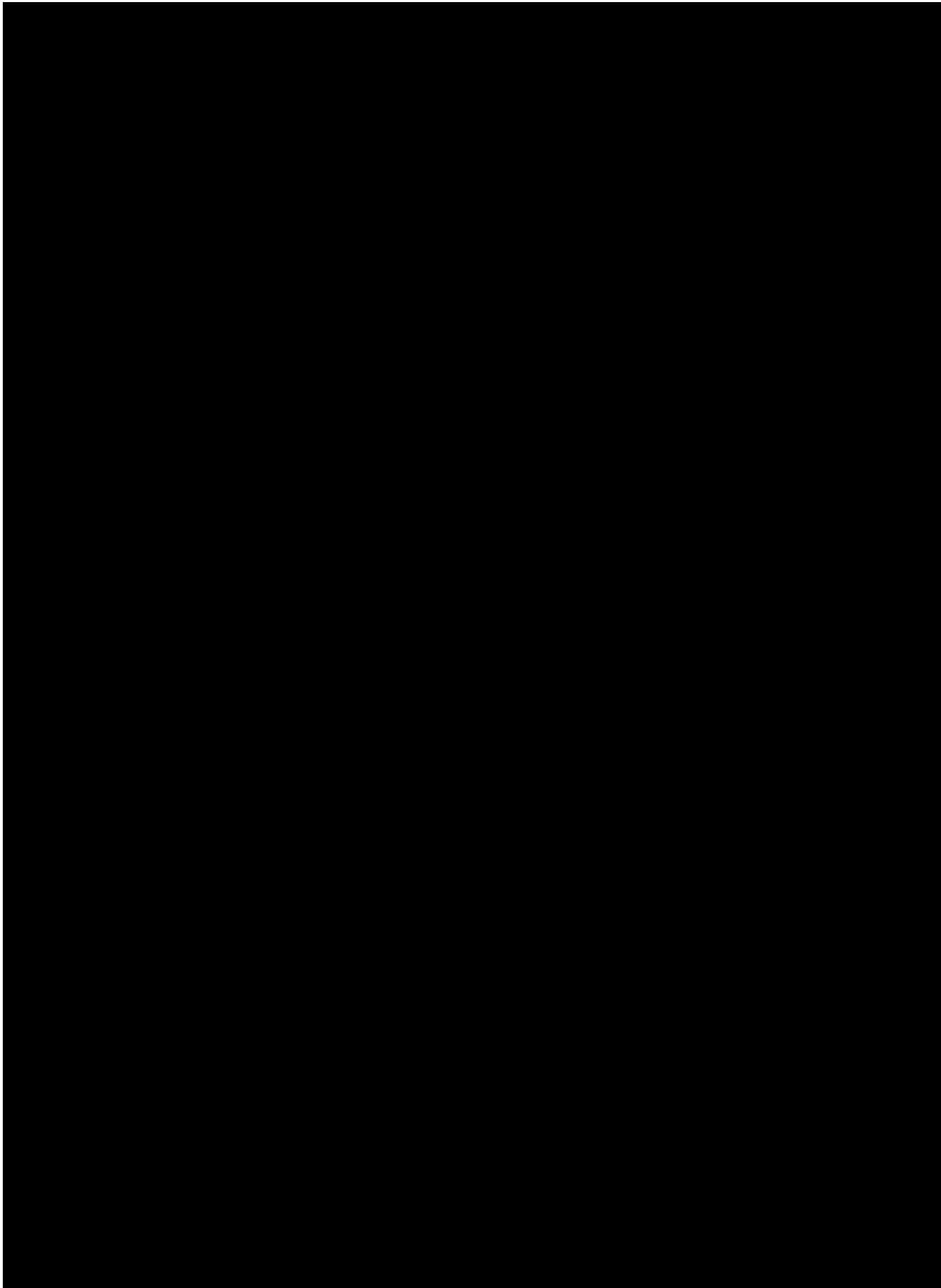


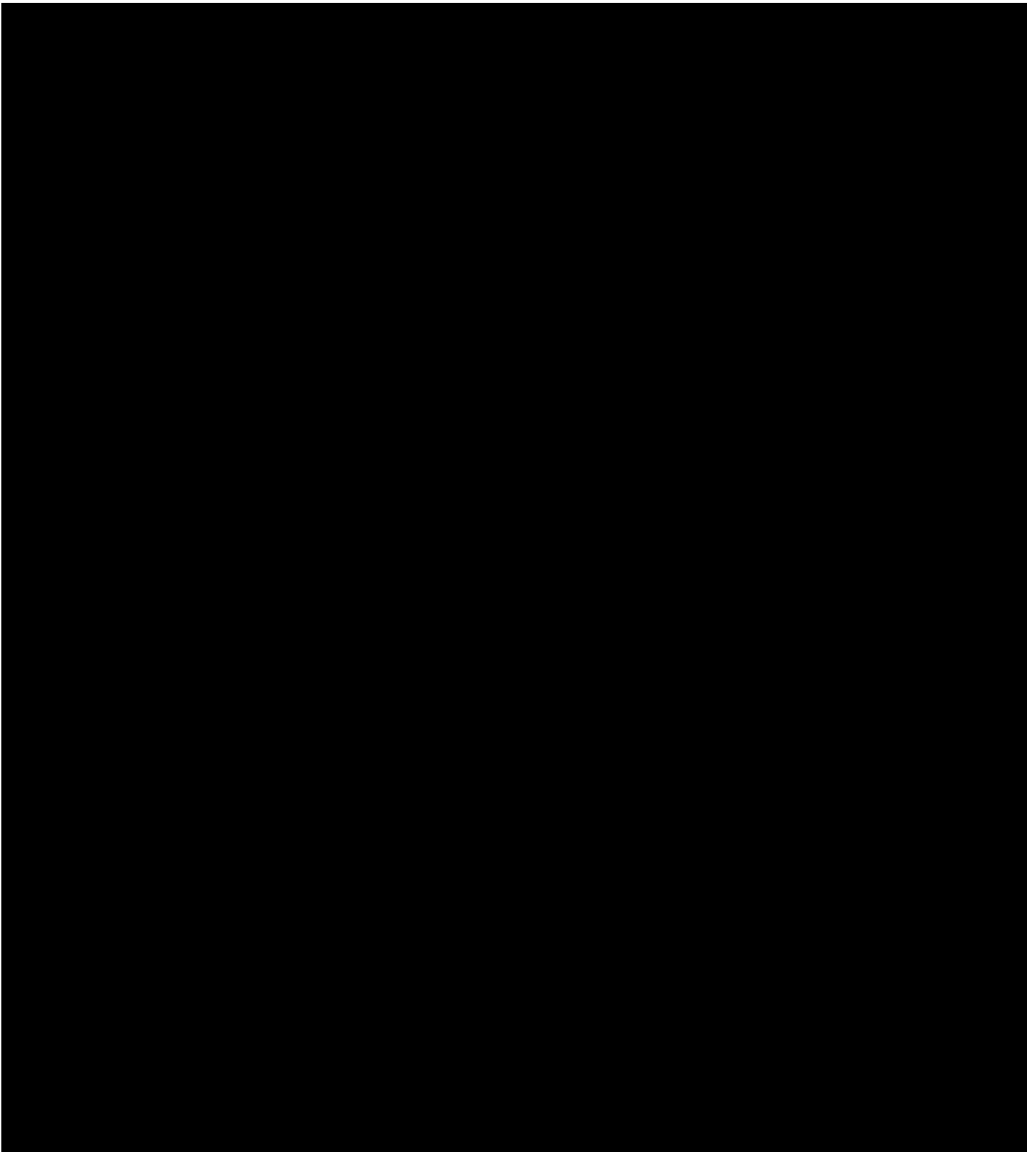


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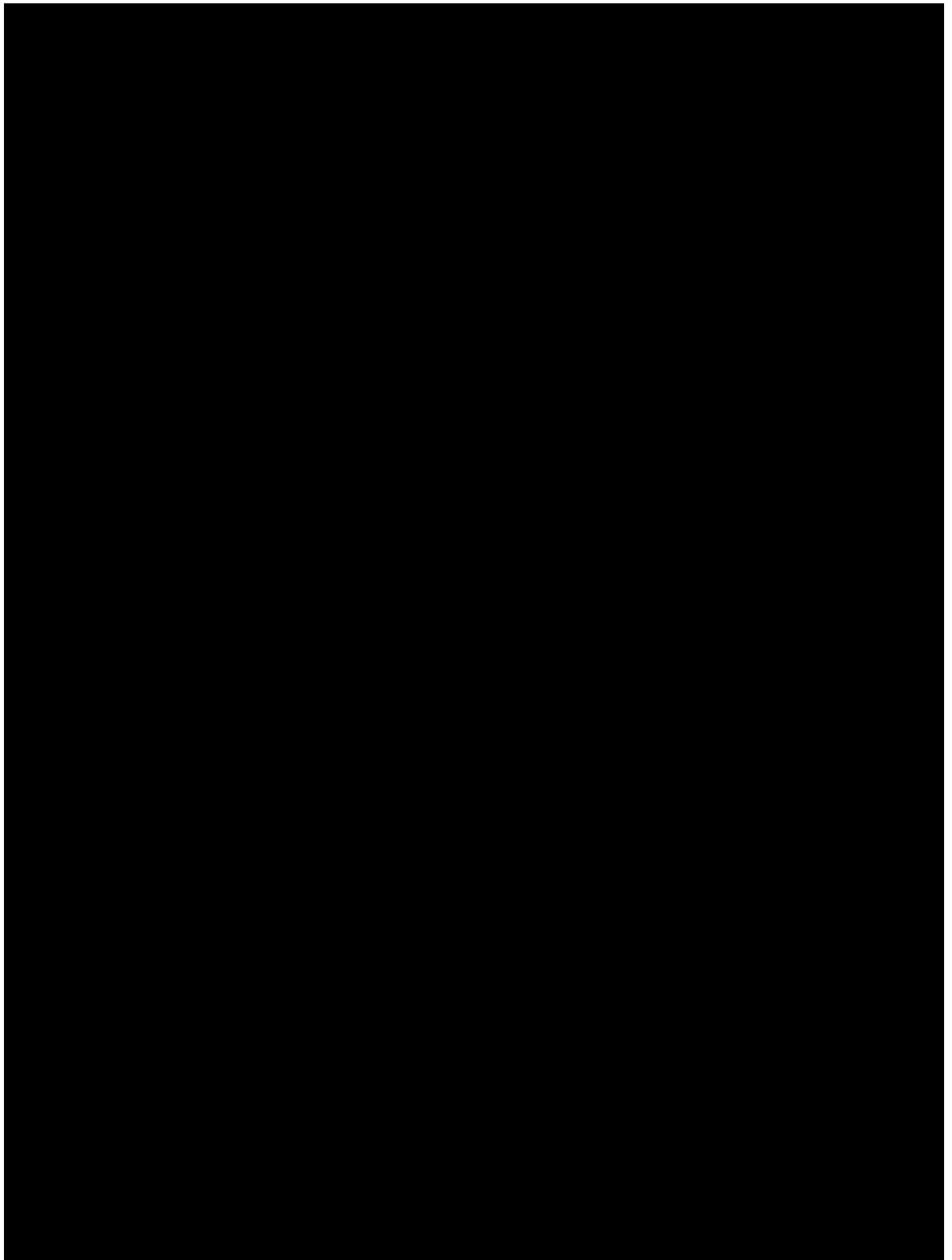
Exhibit A

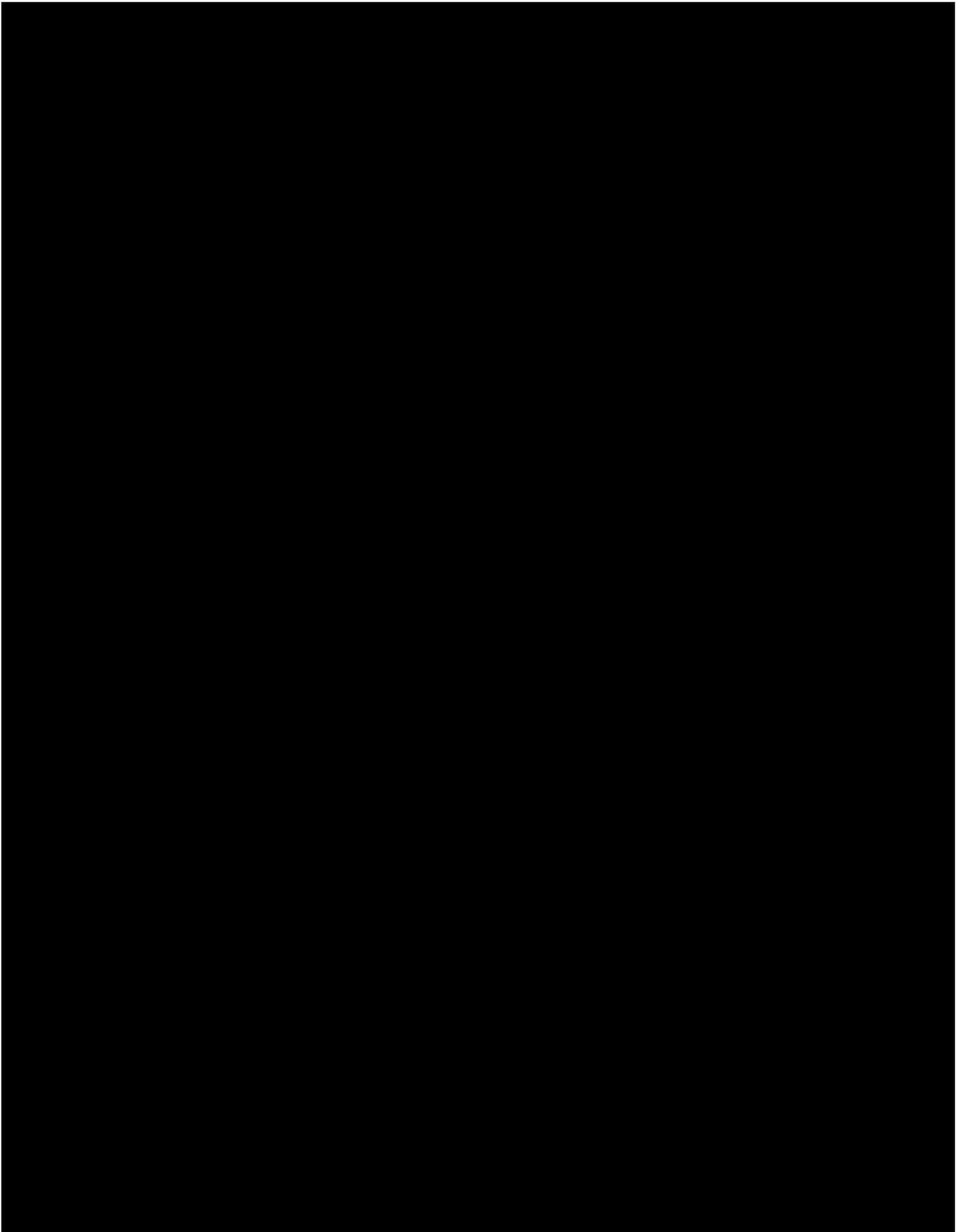




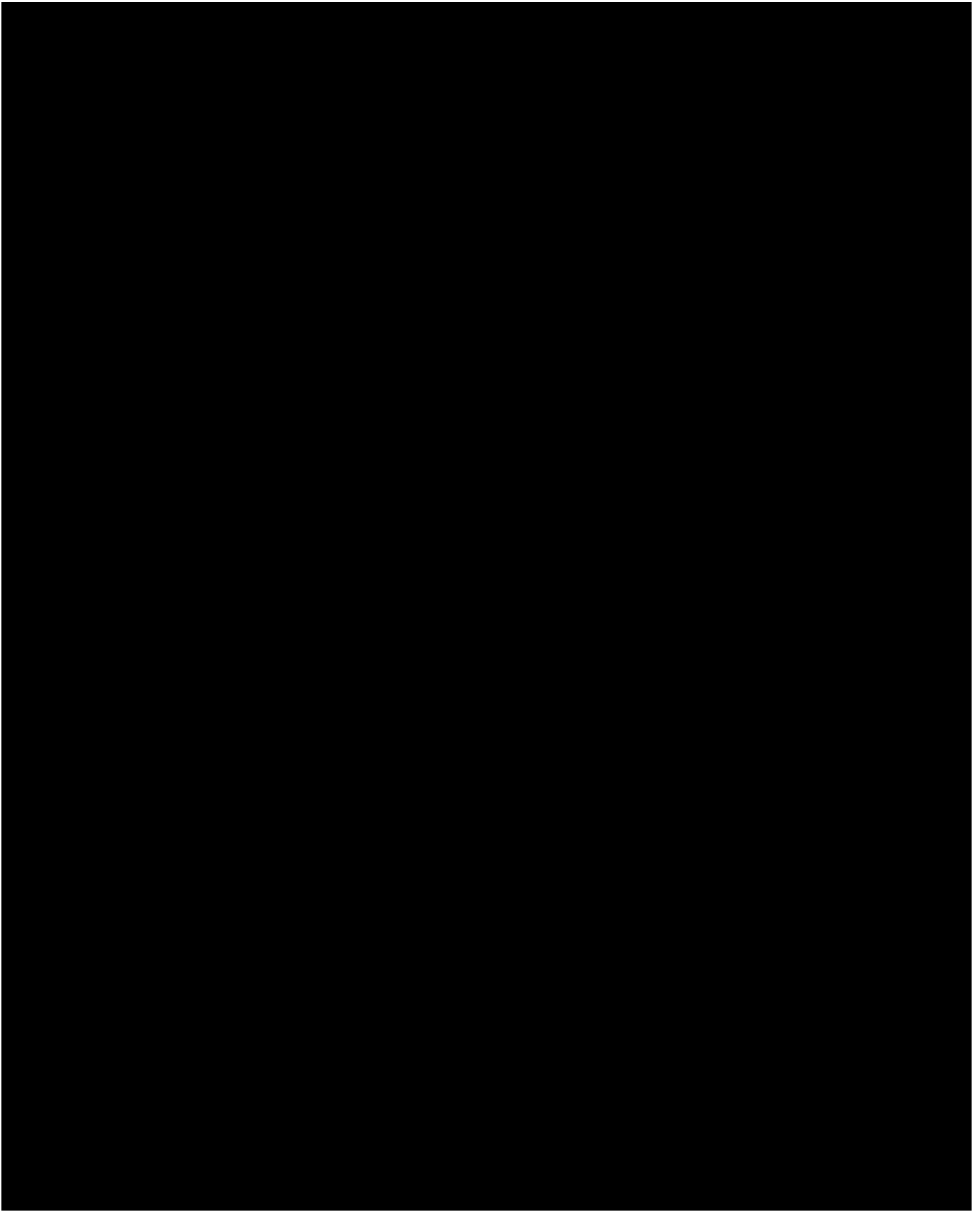


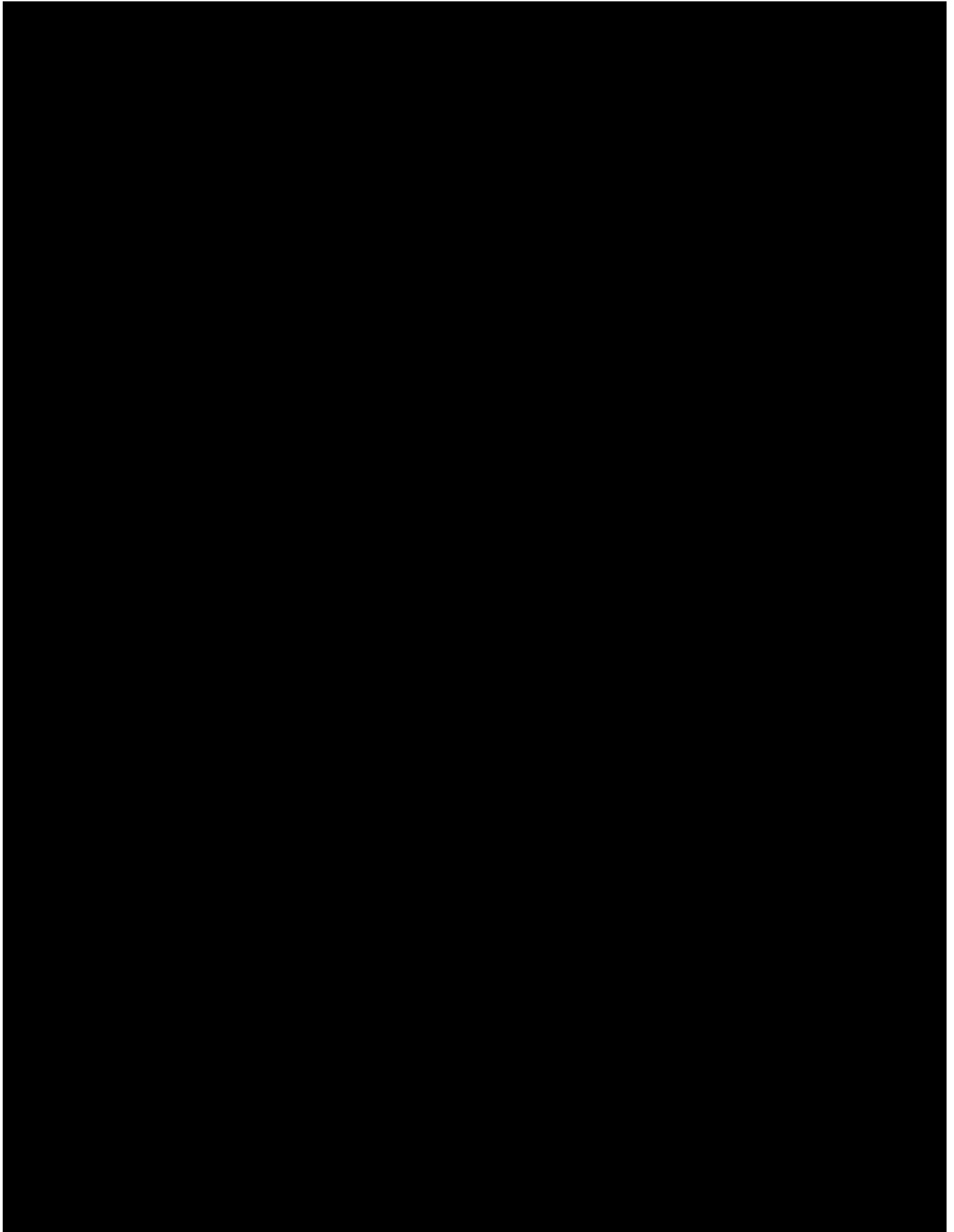
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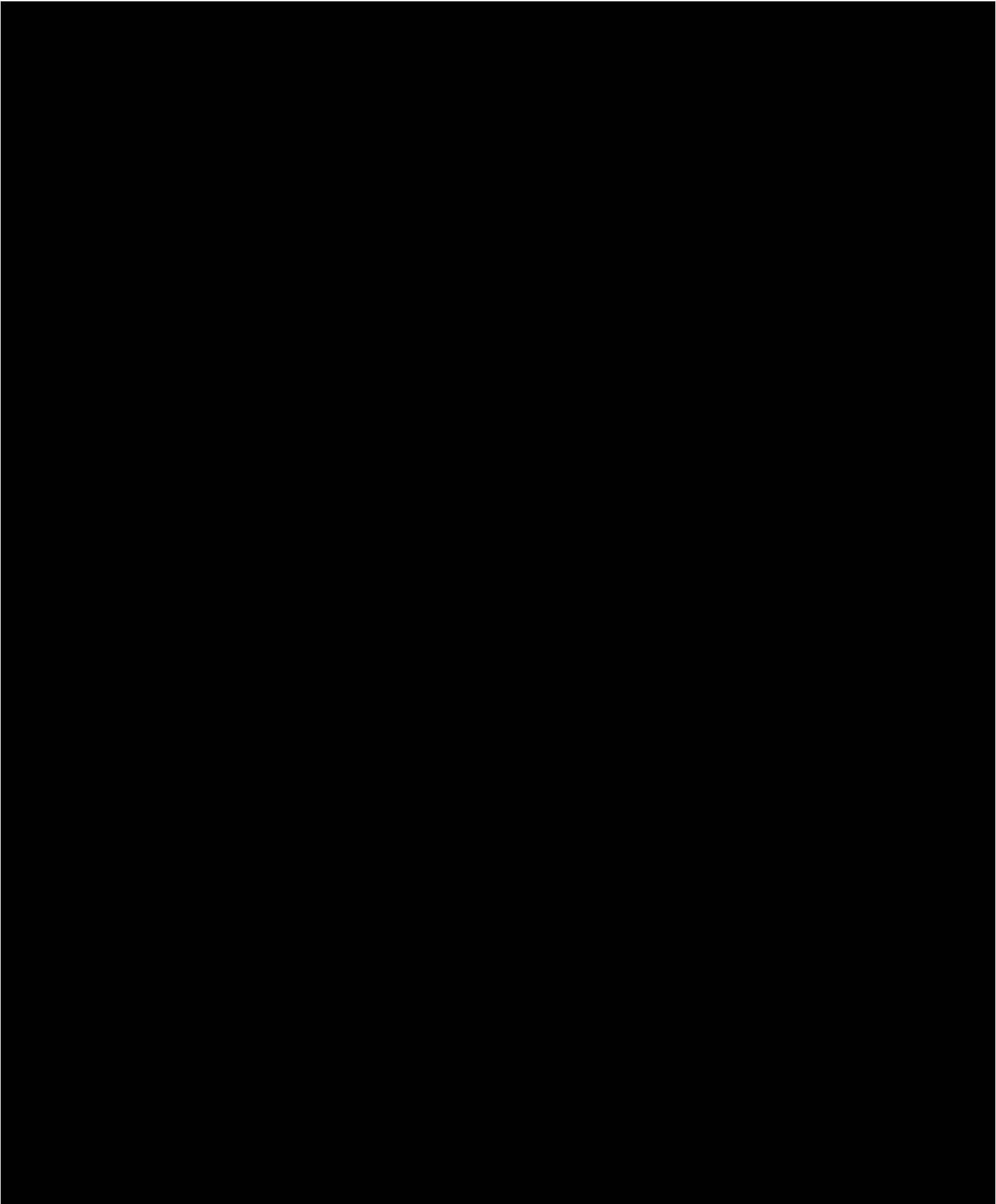


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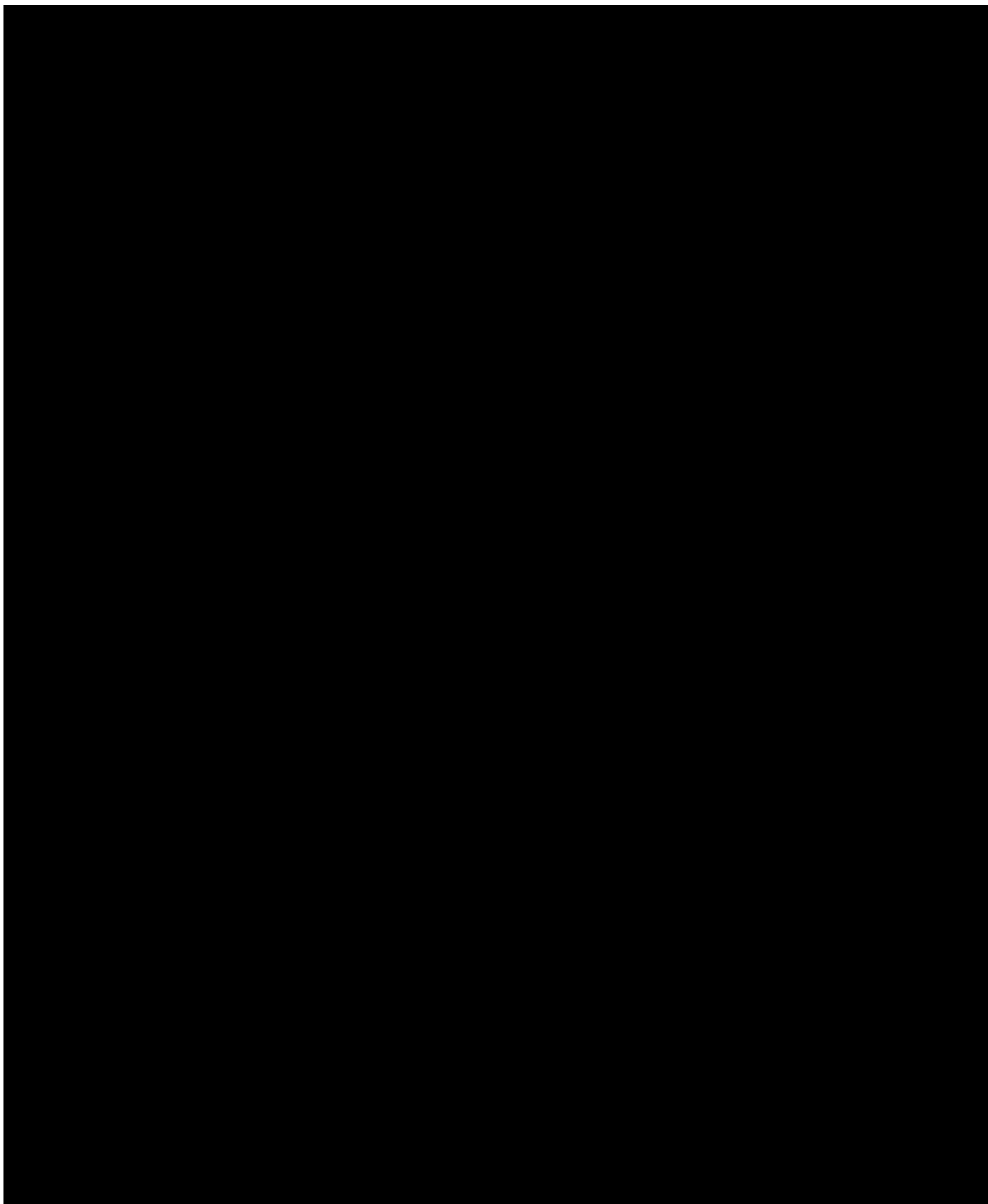




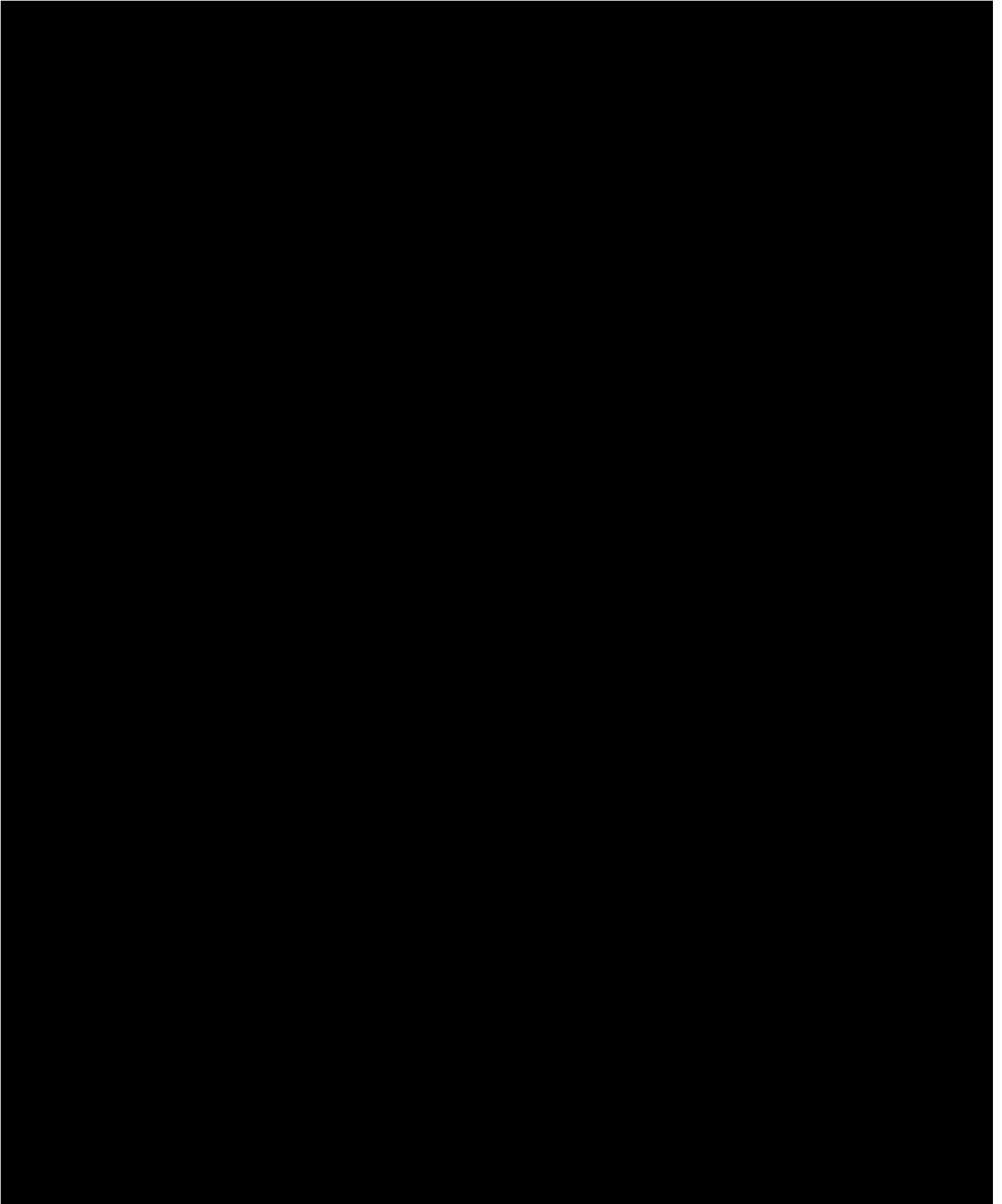
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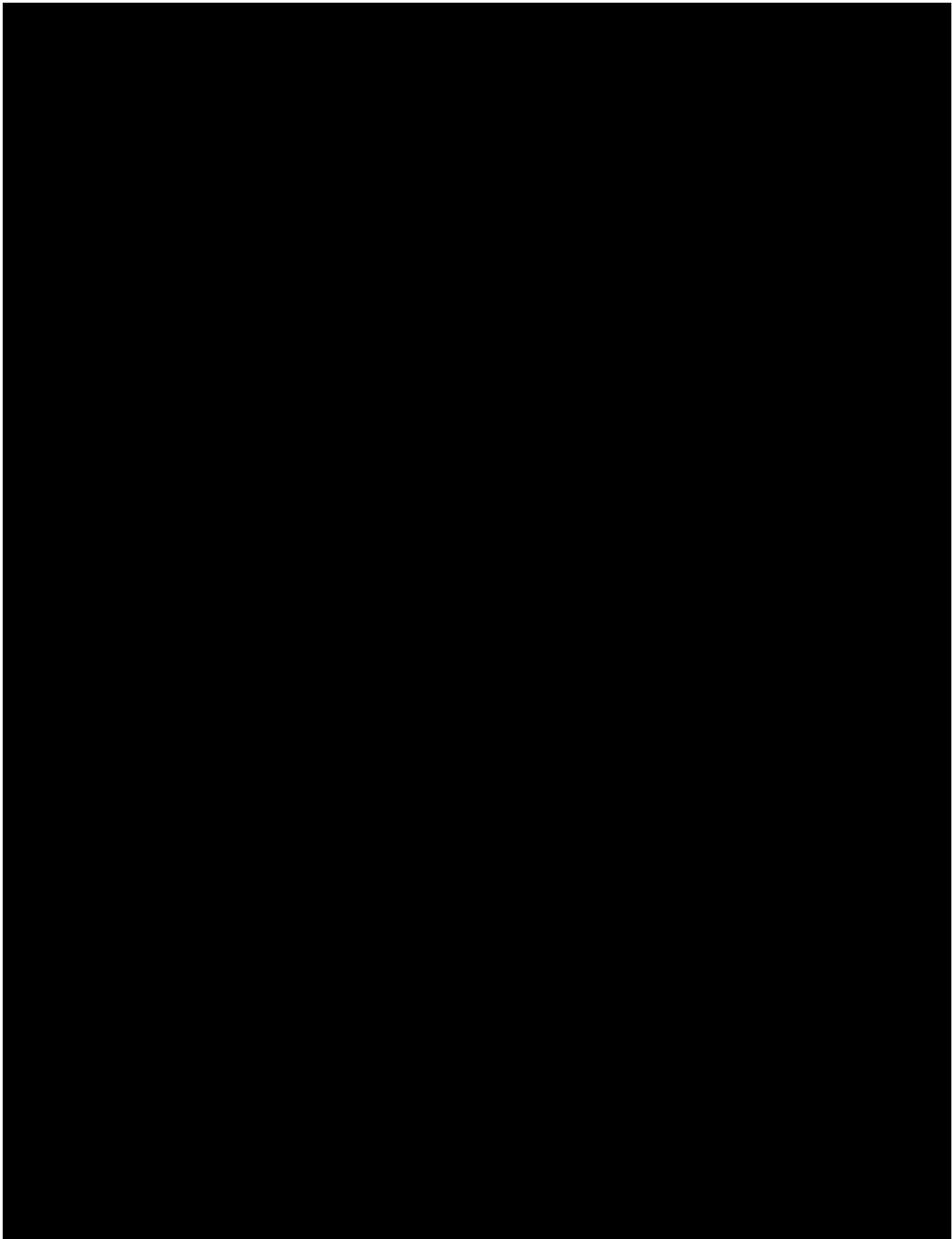
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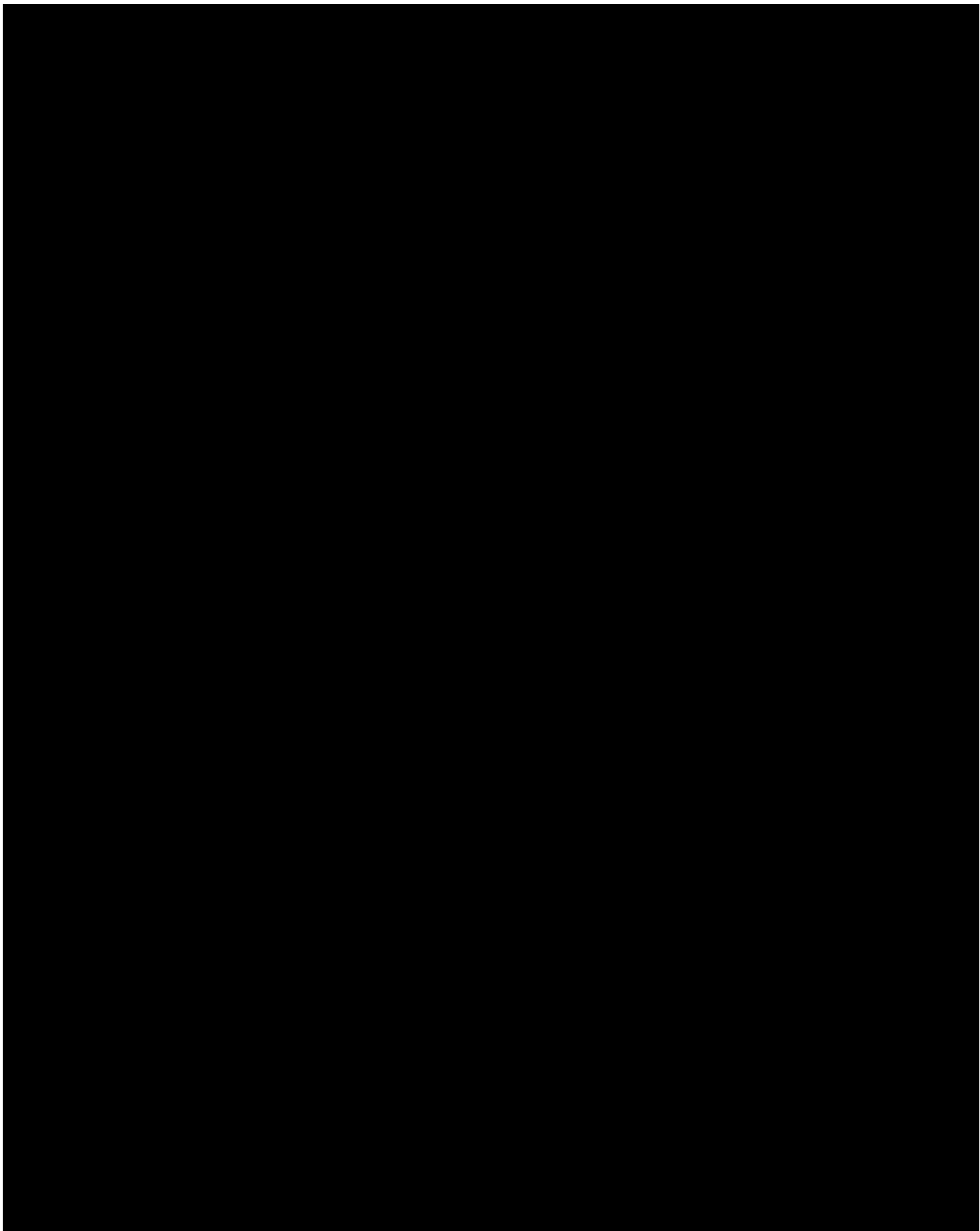
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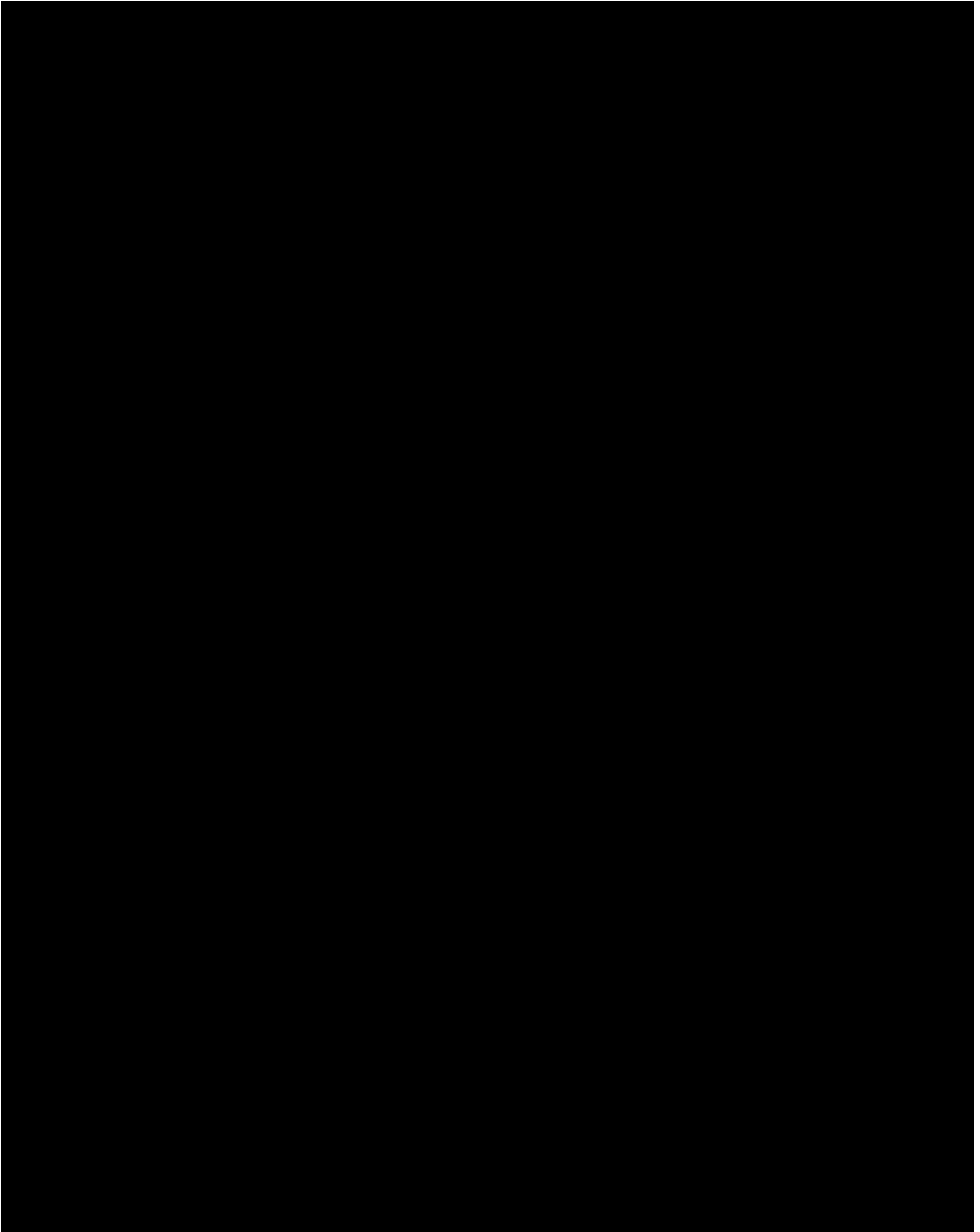
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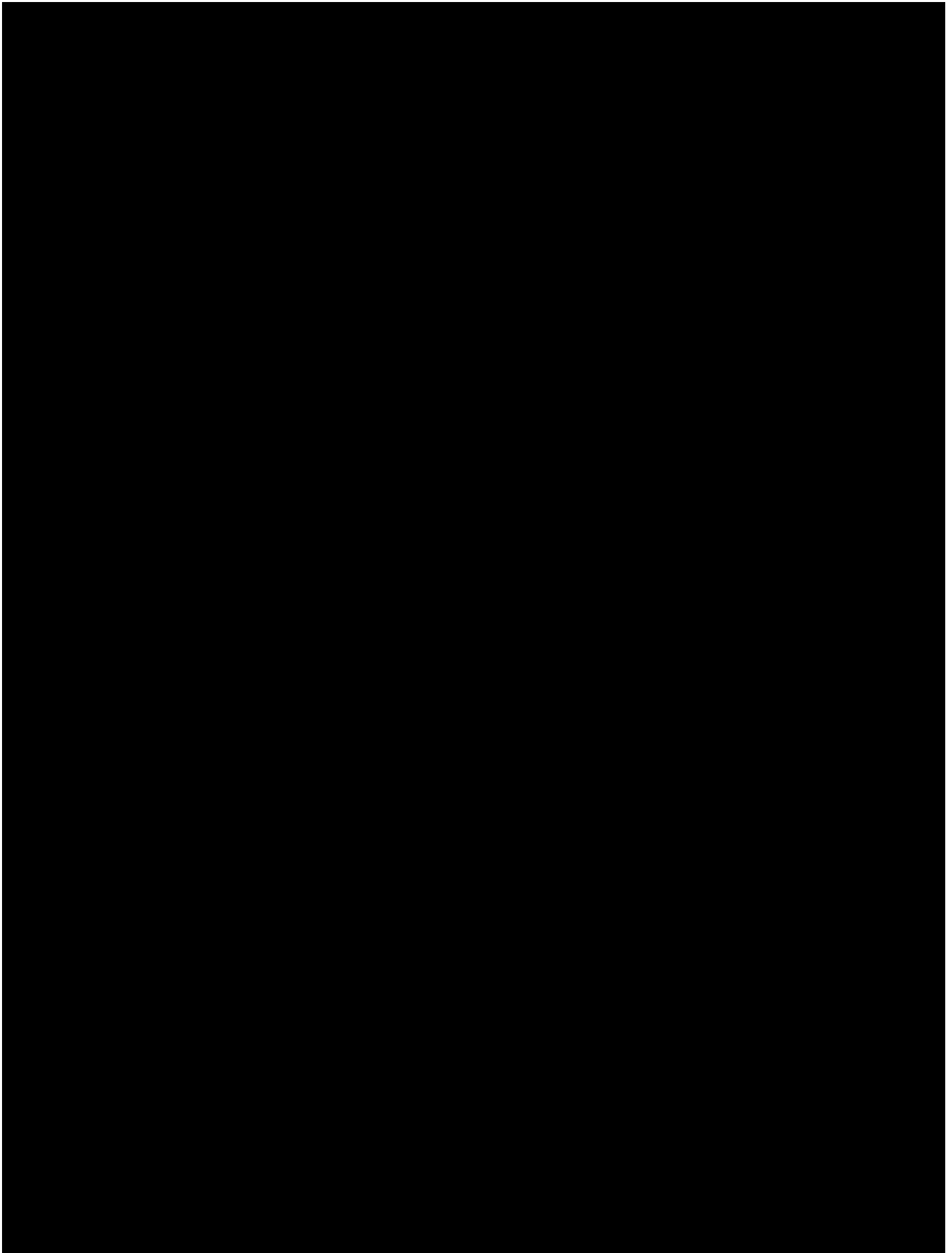
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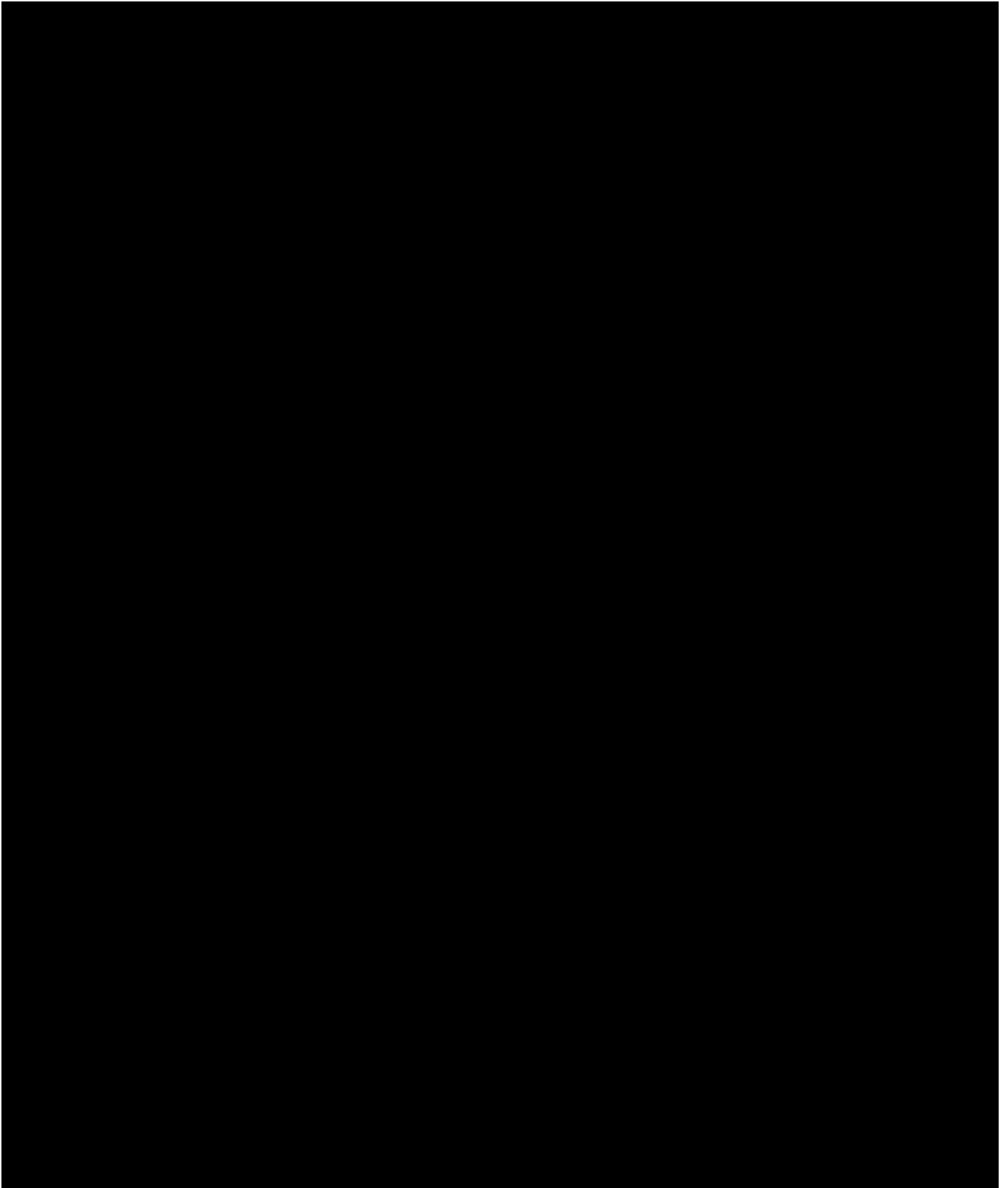


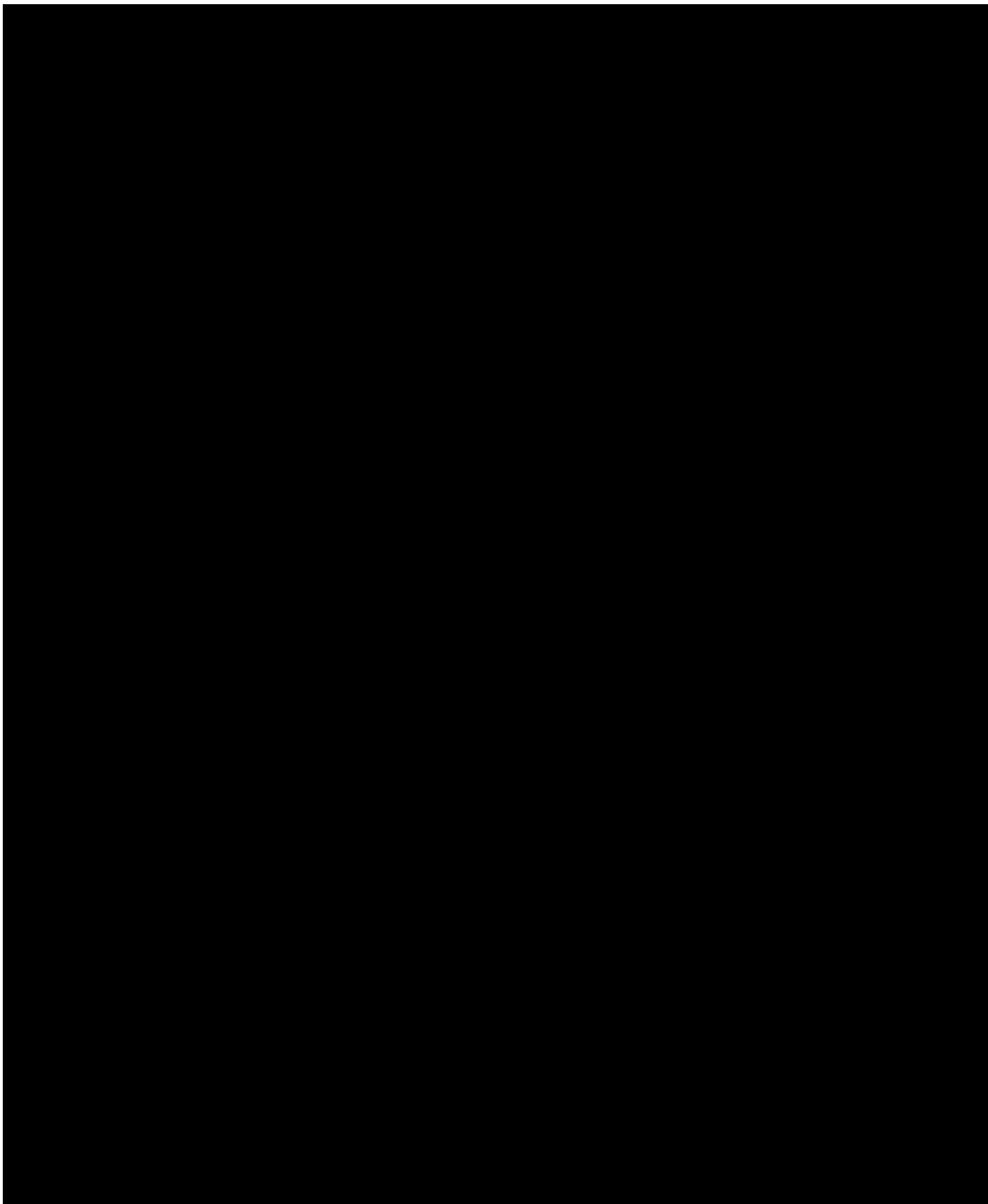
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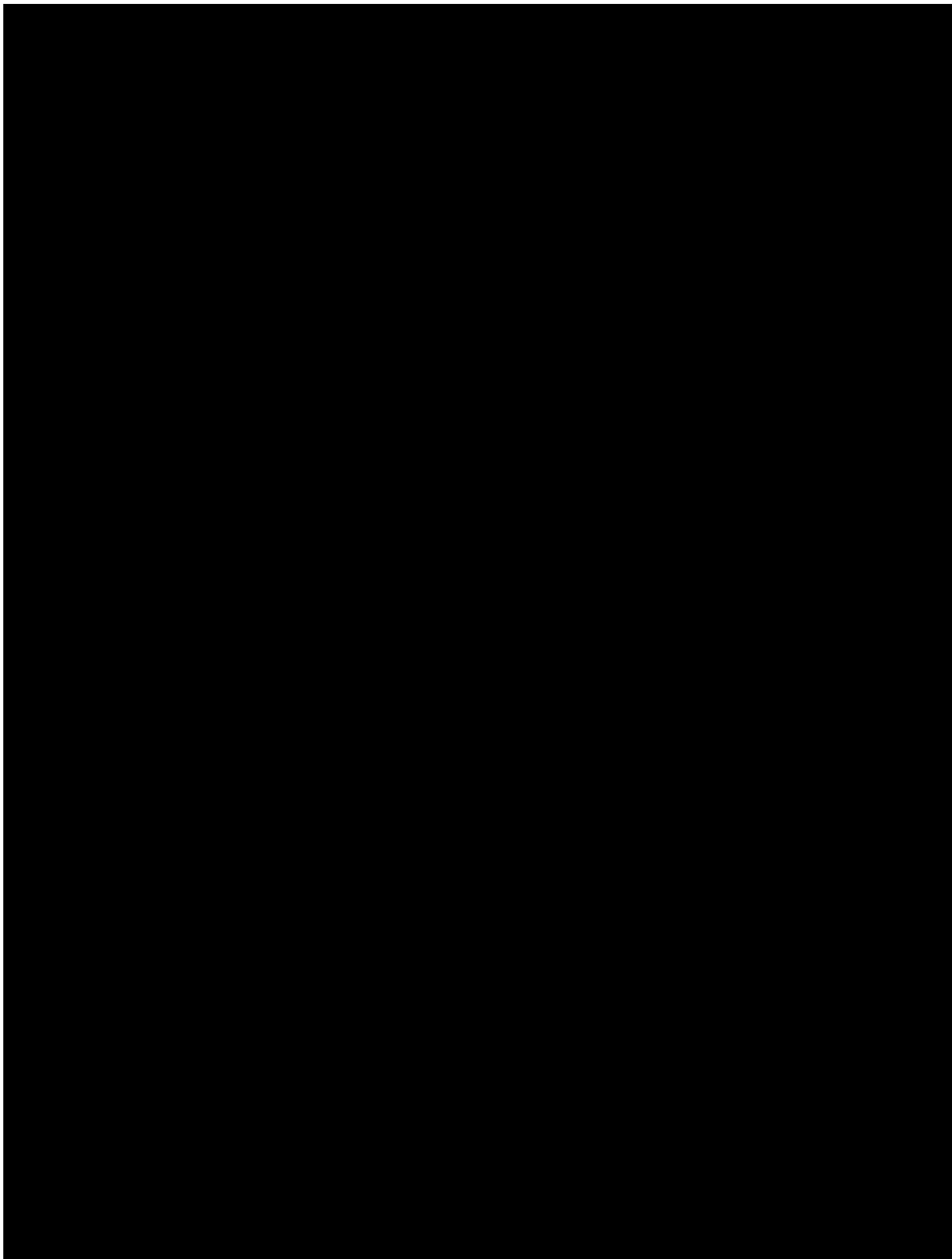
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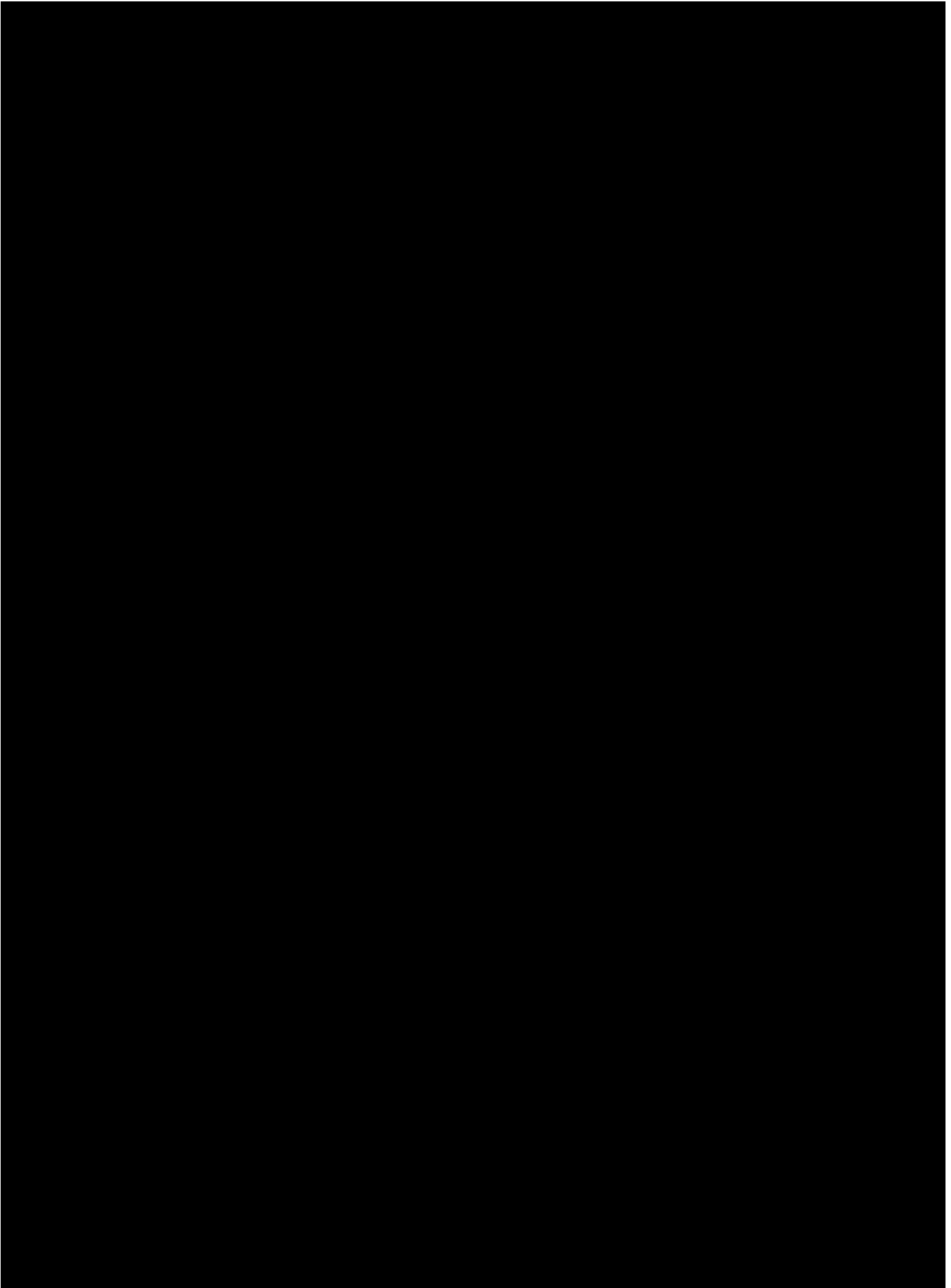


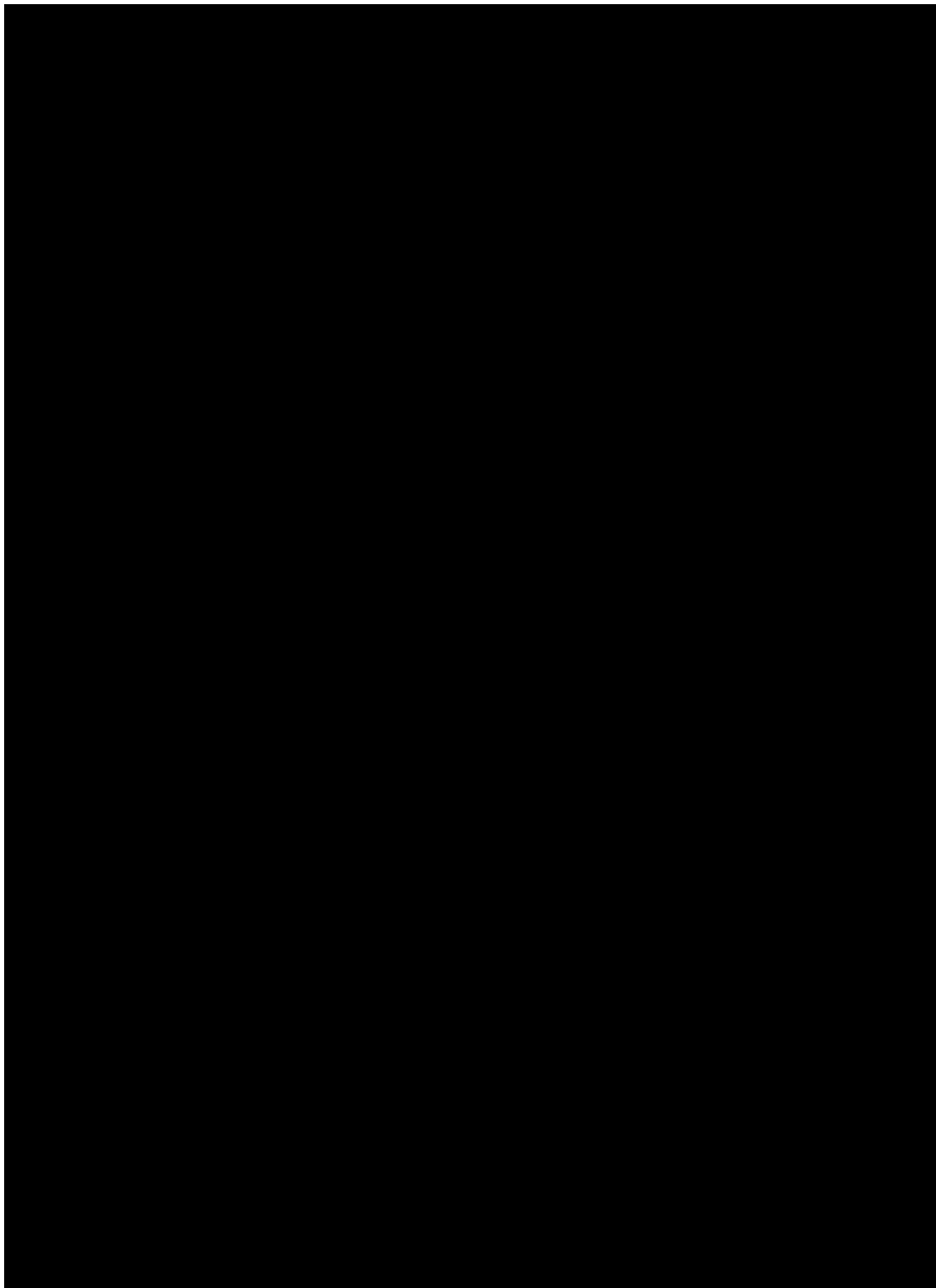


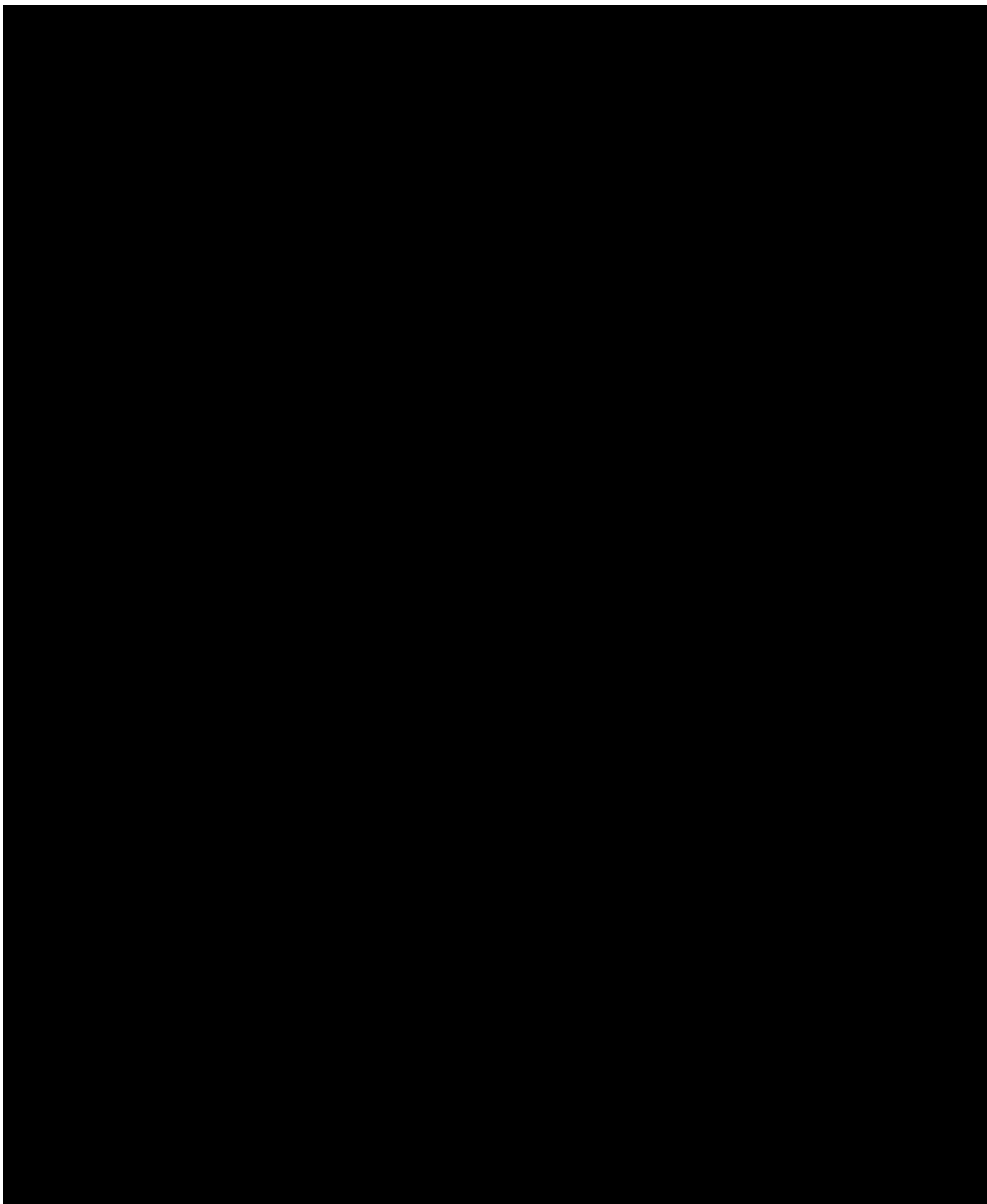


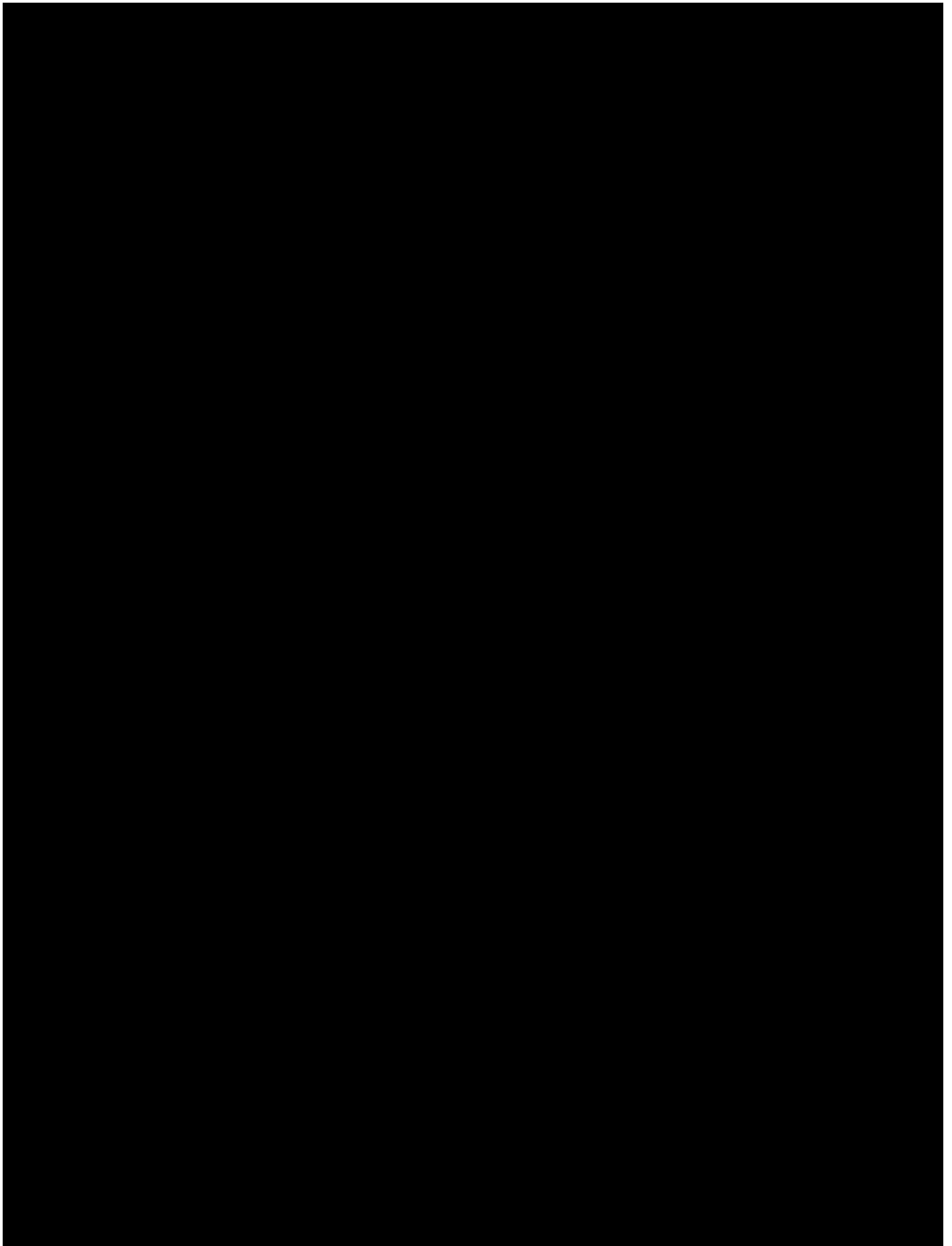
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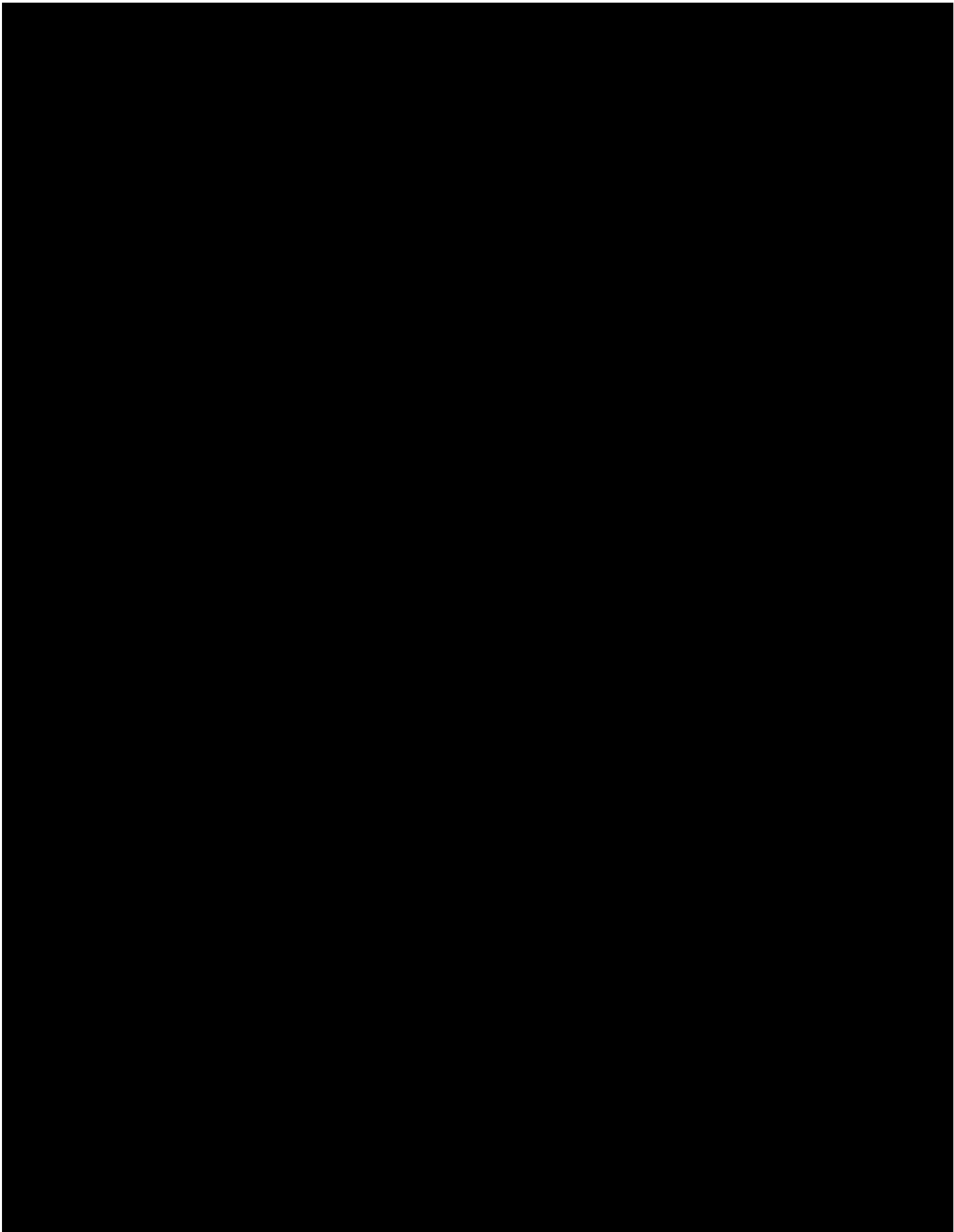


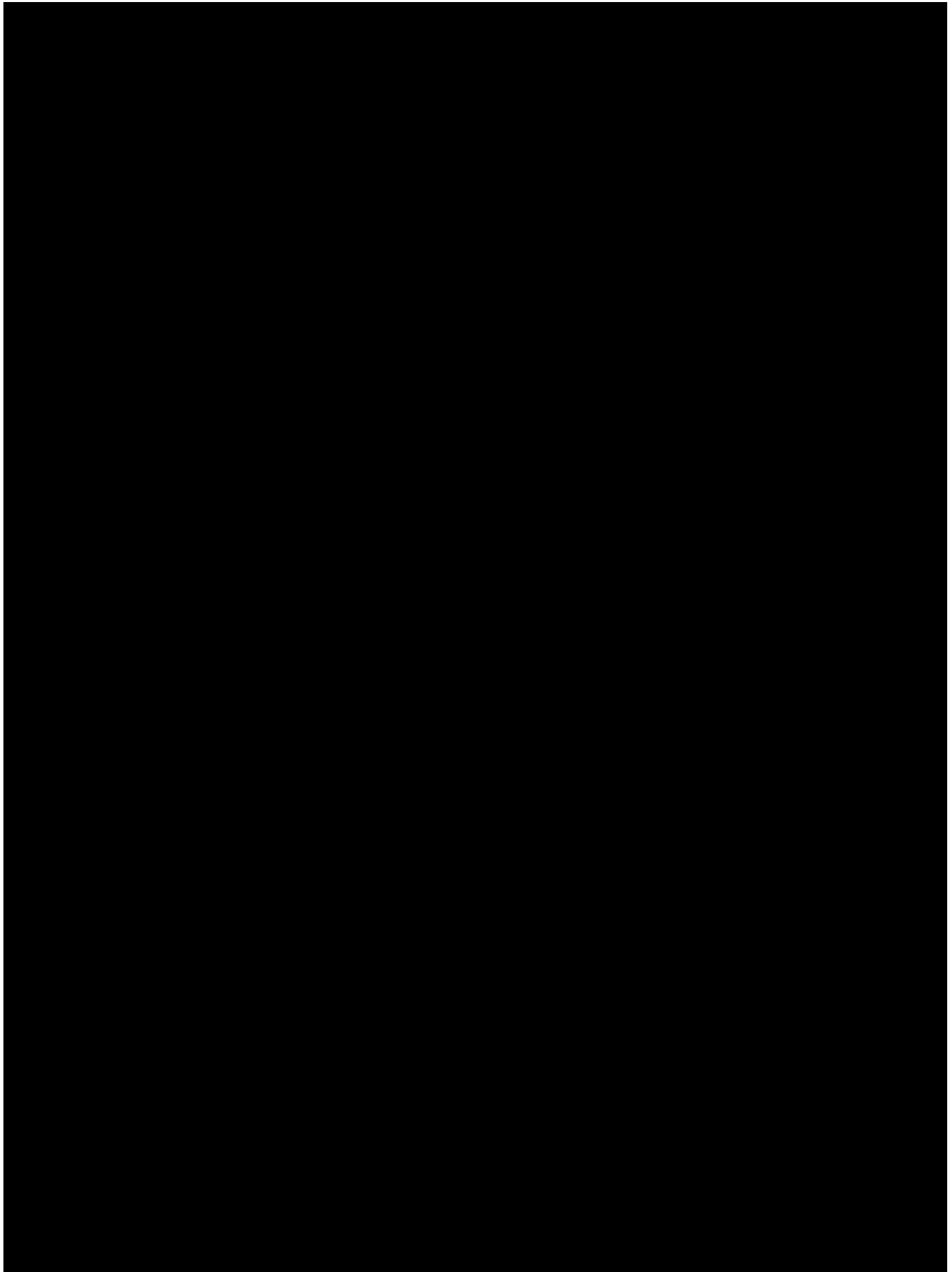


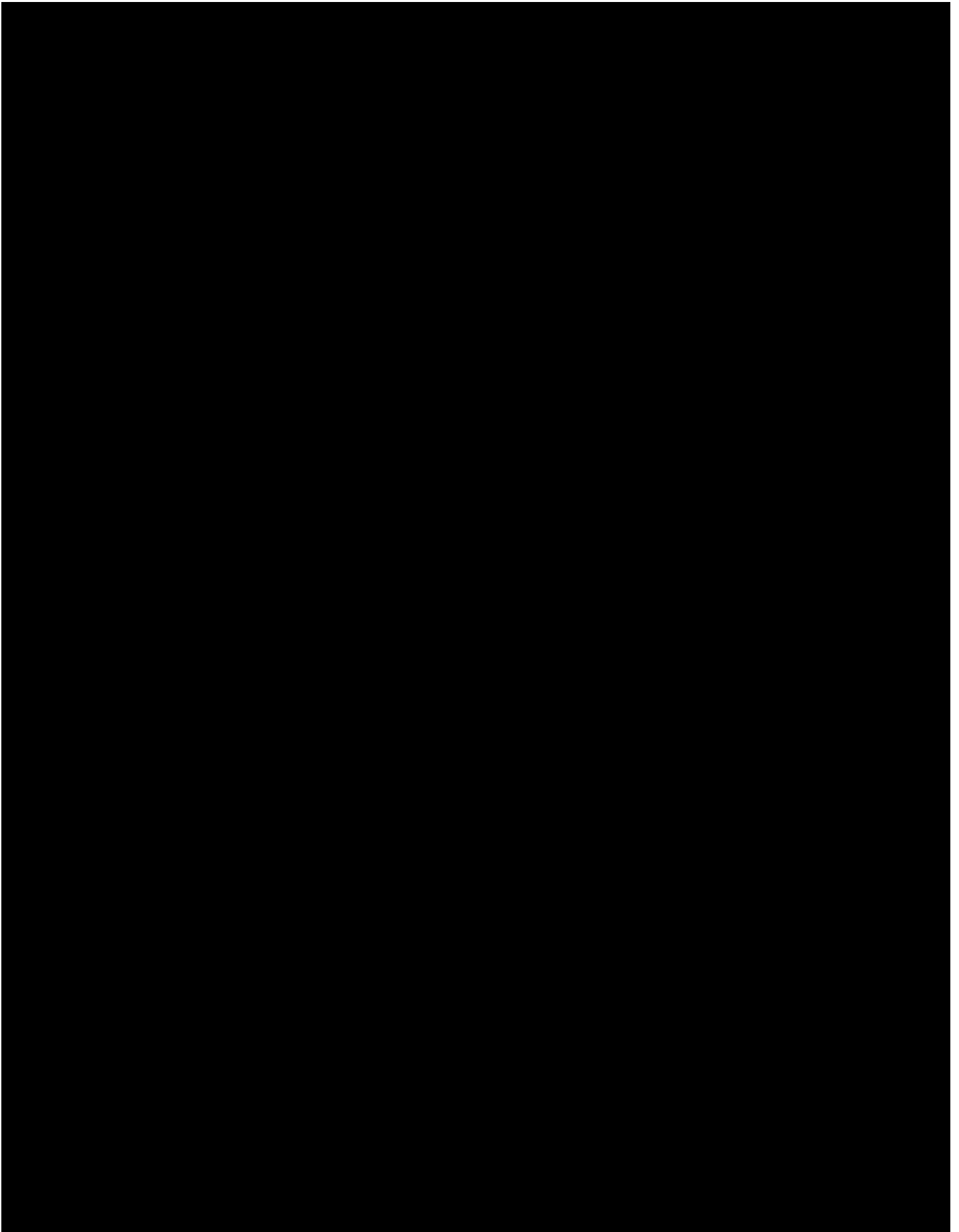


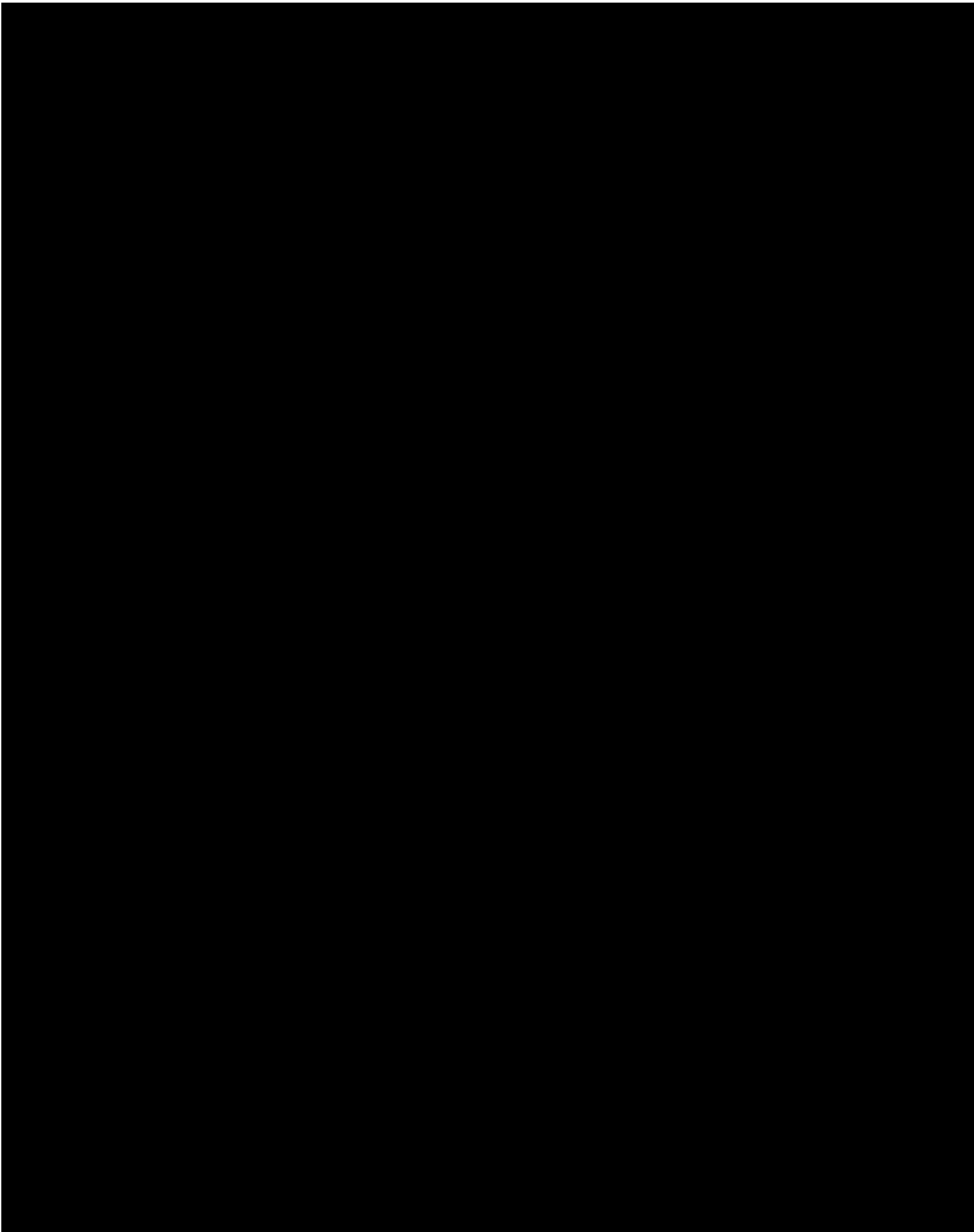


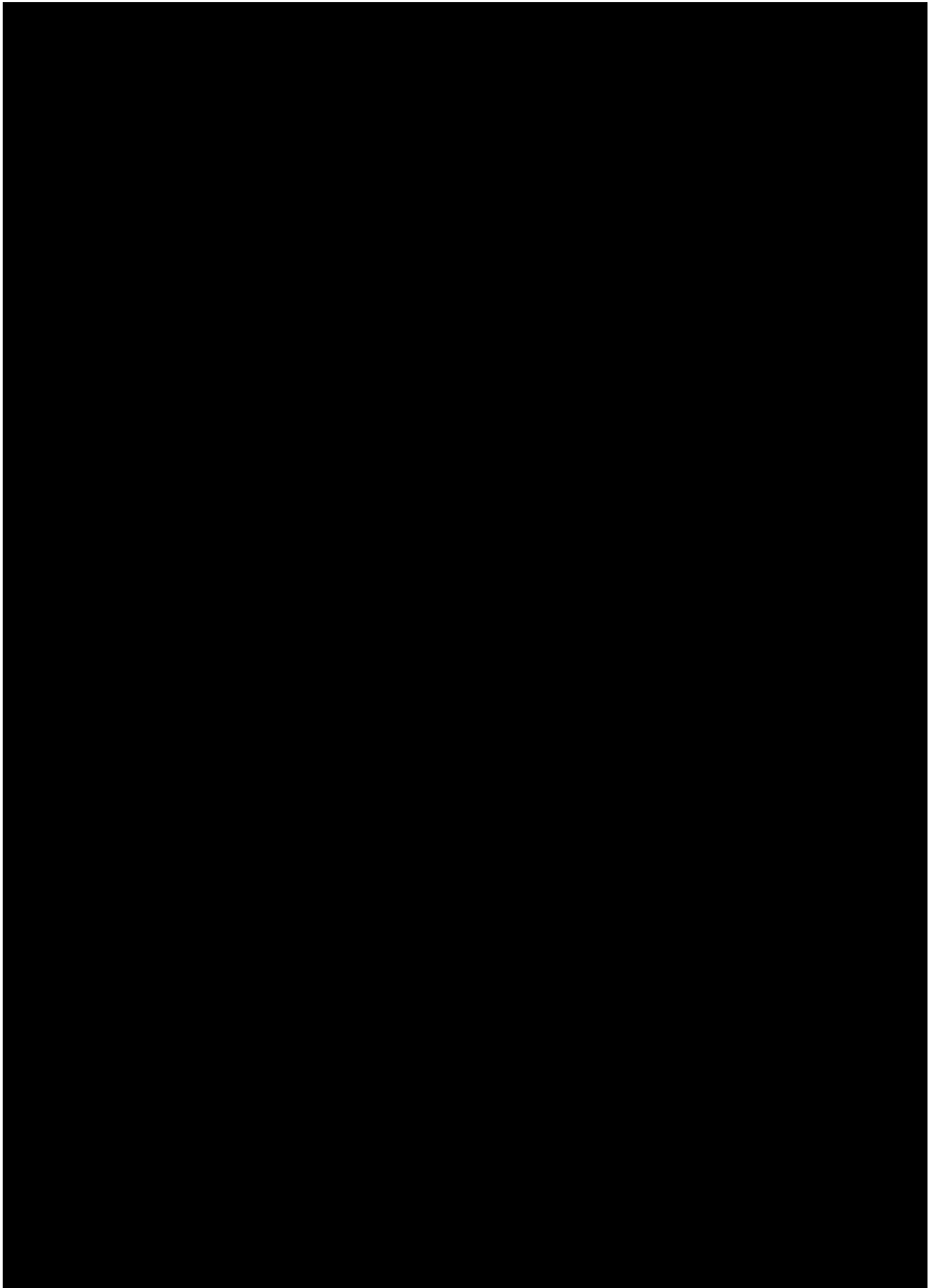


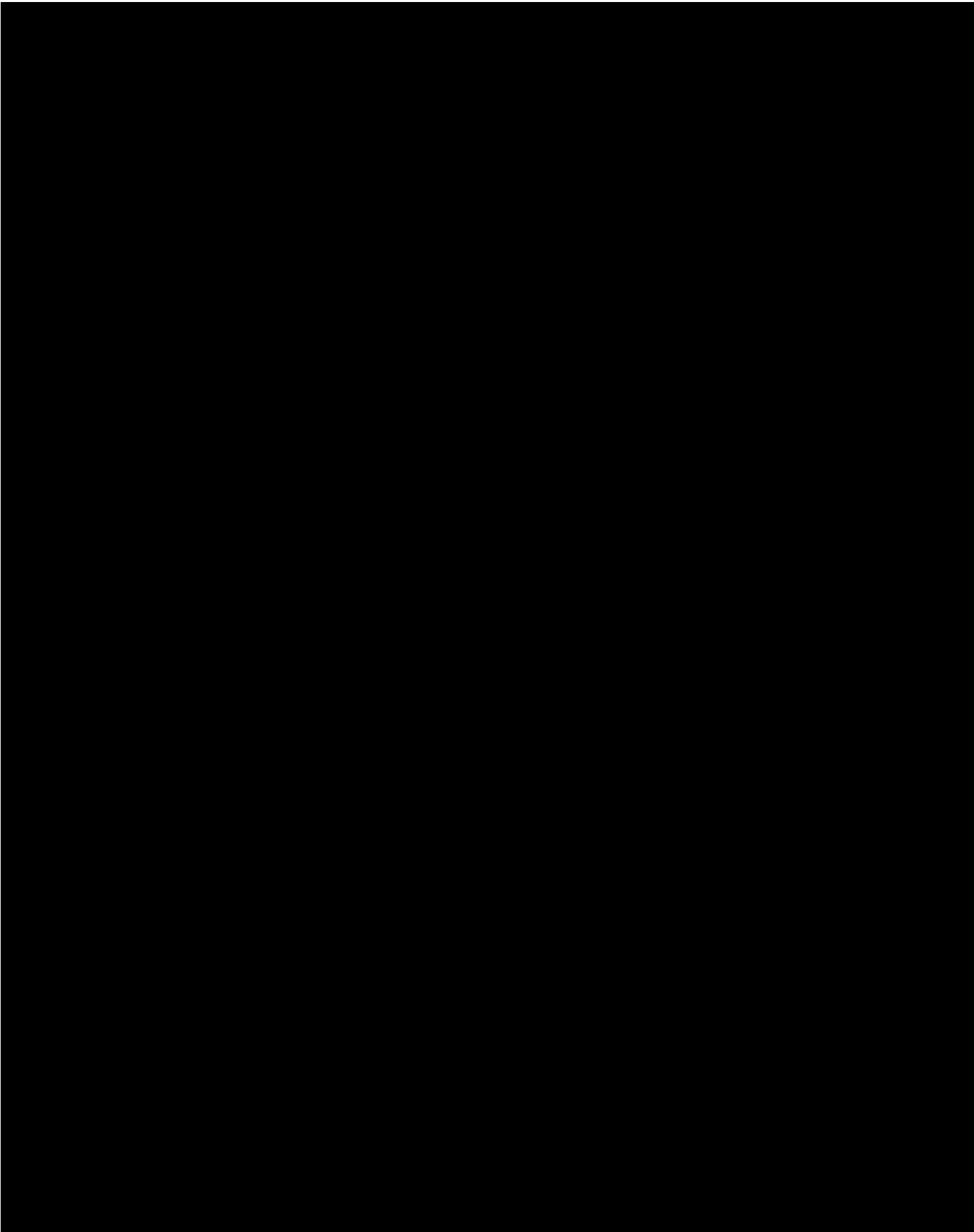




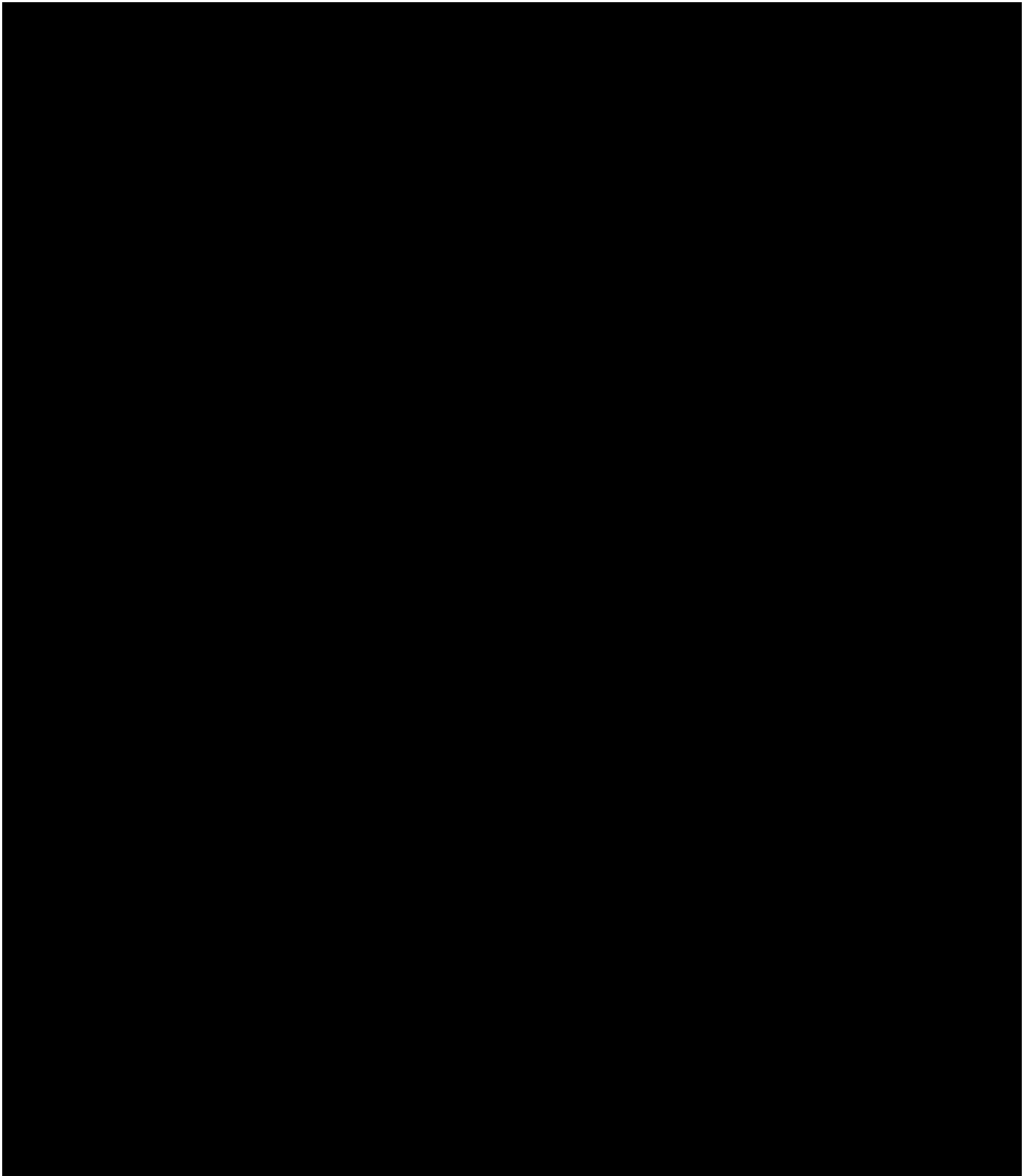




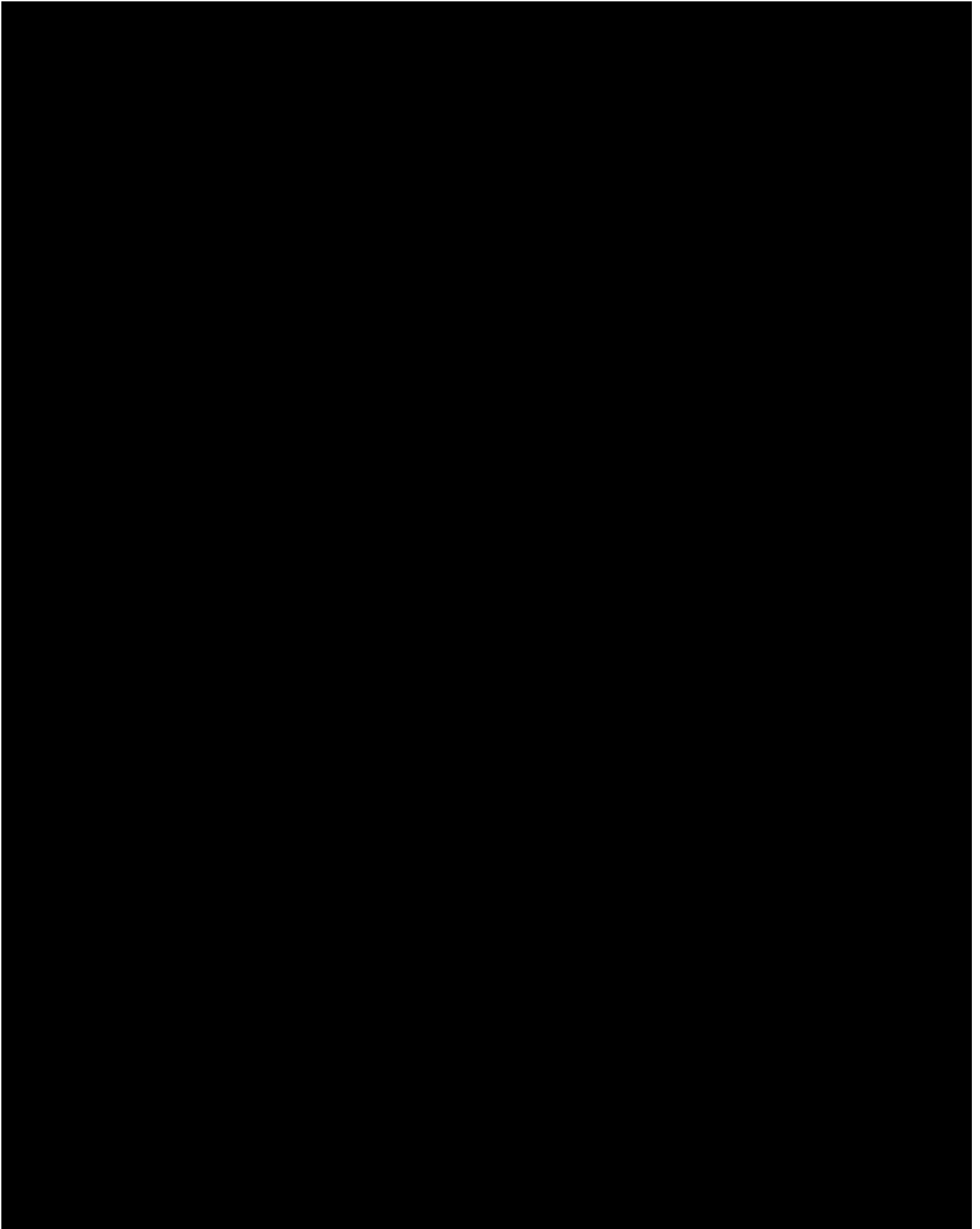




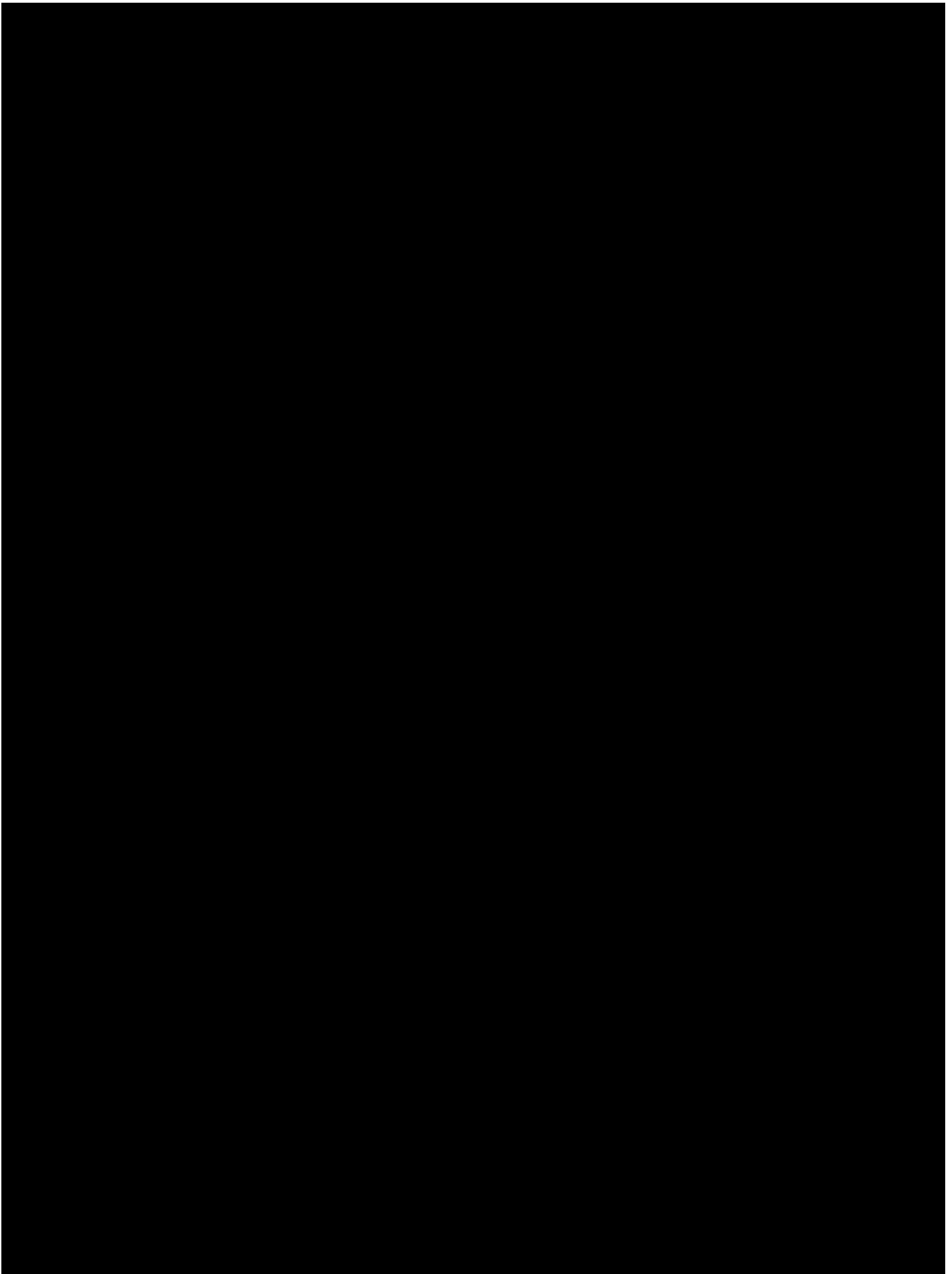
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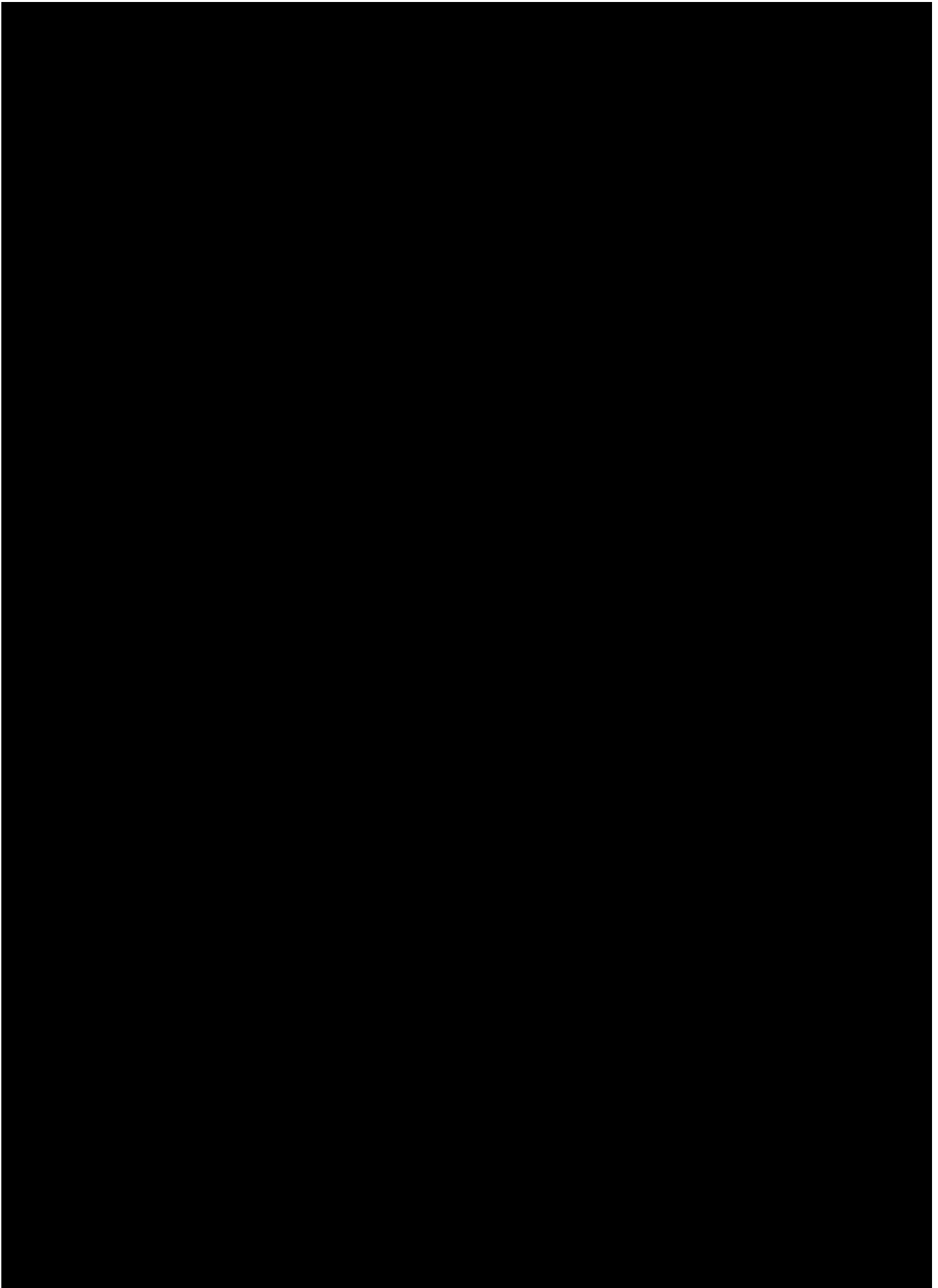
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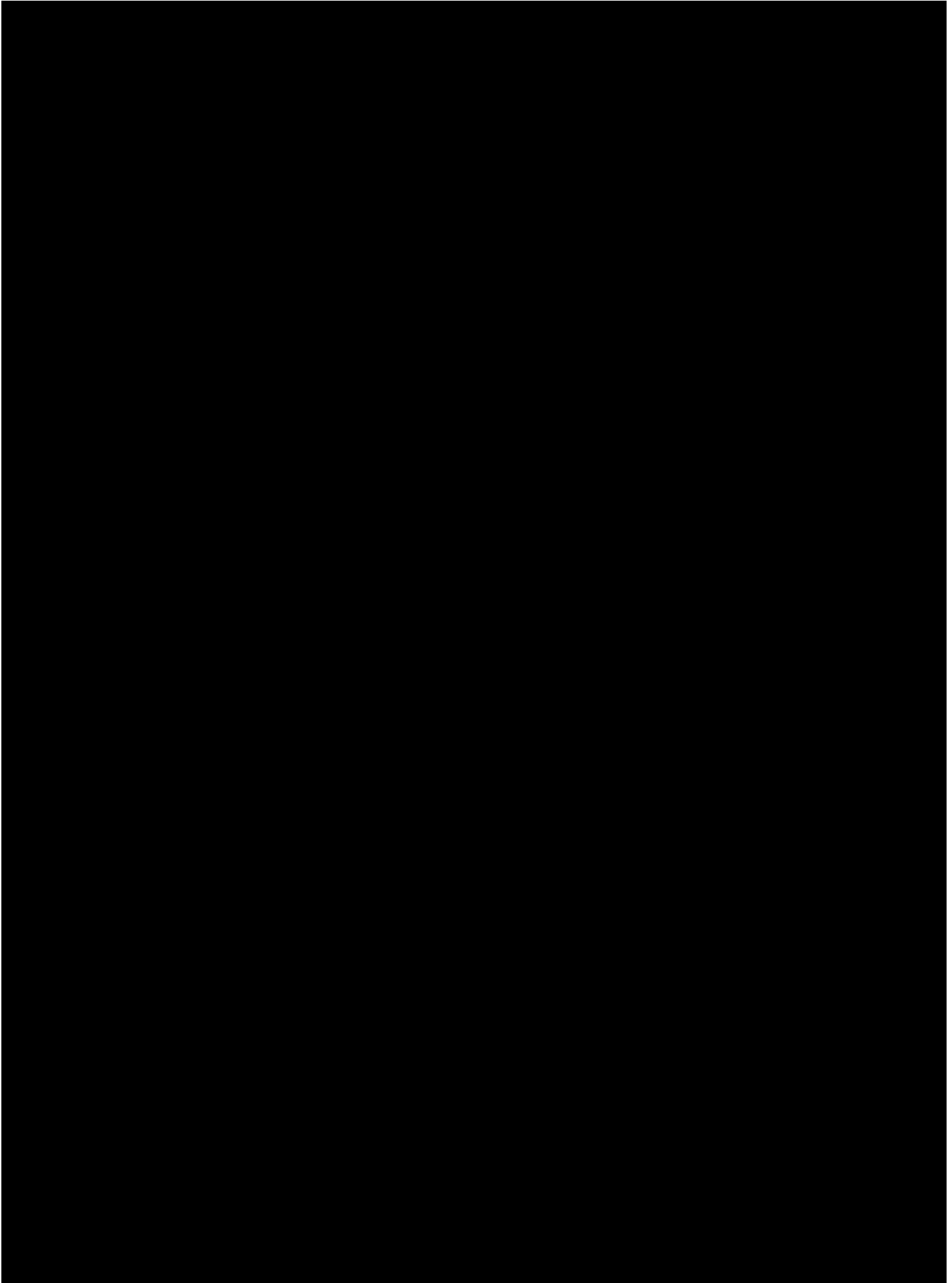


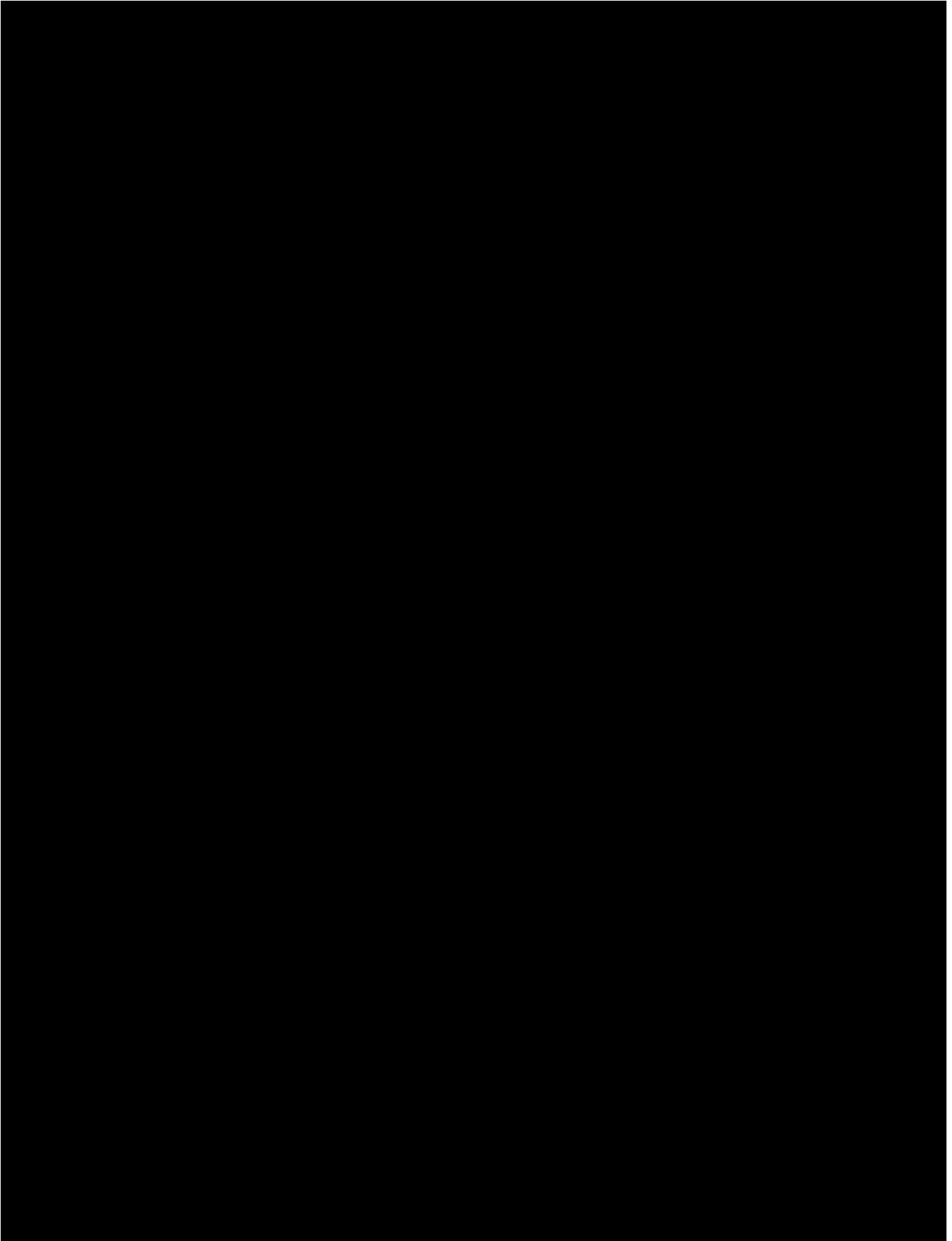
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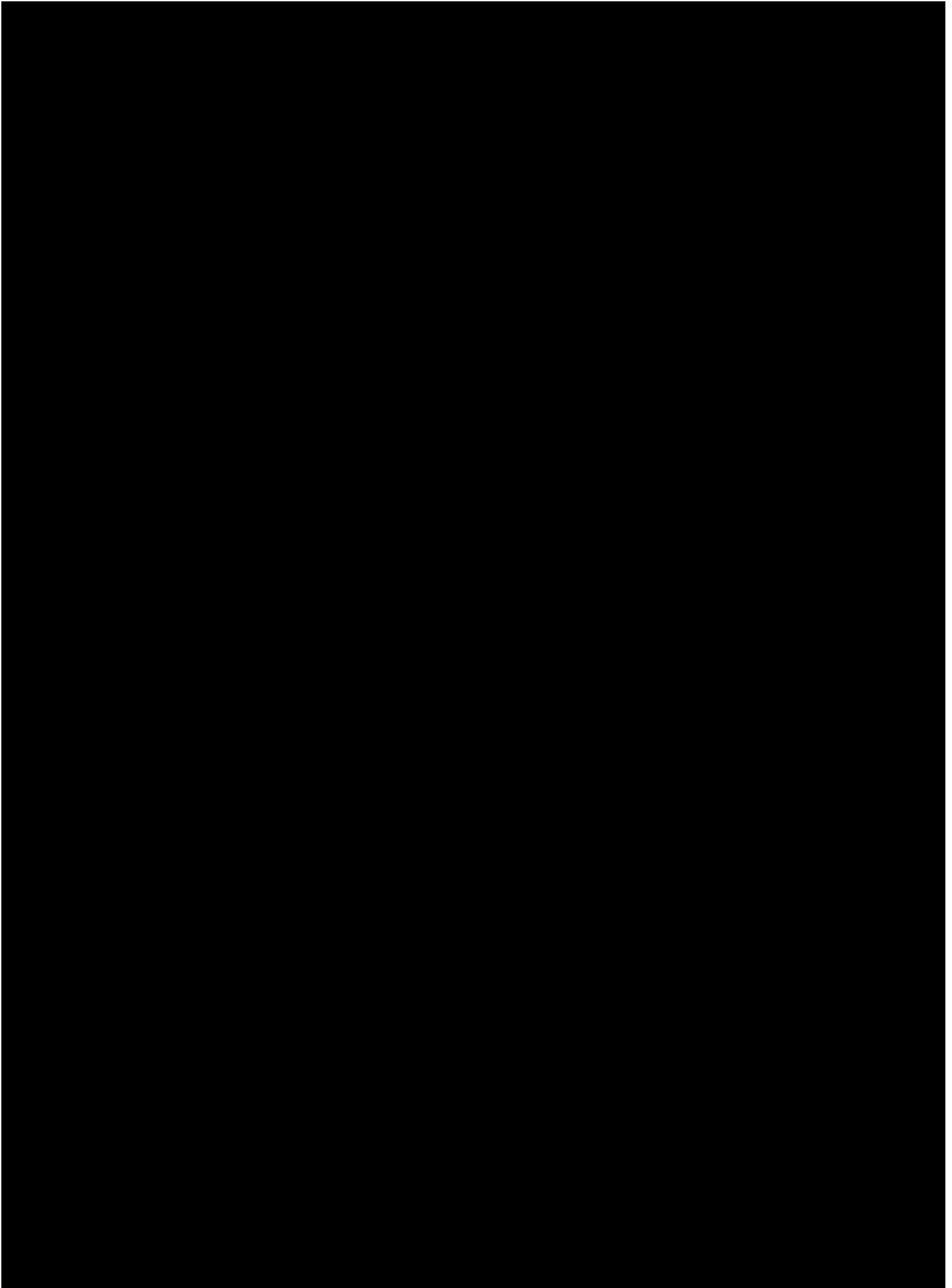
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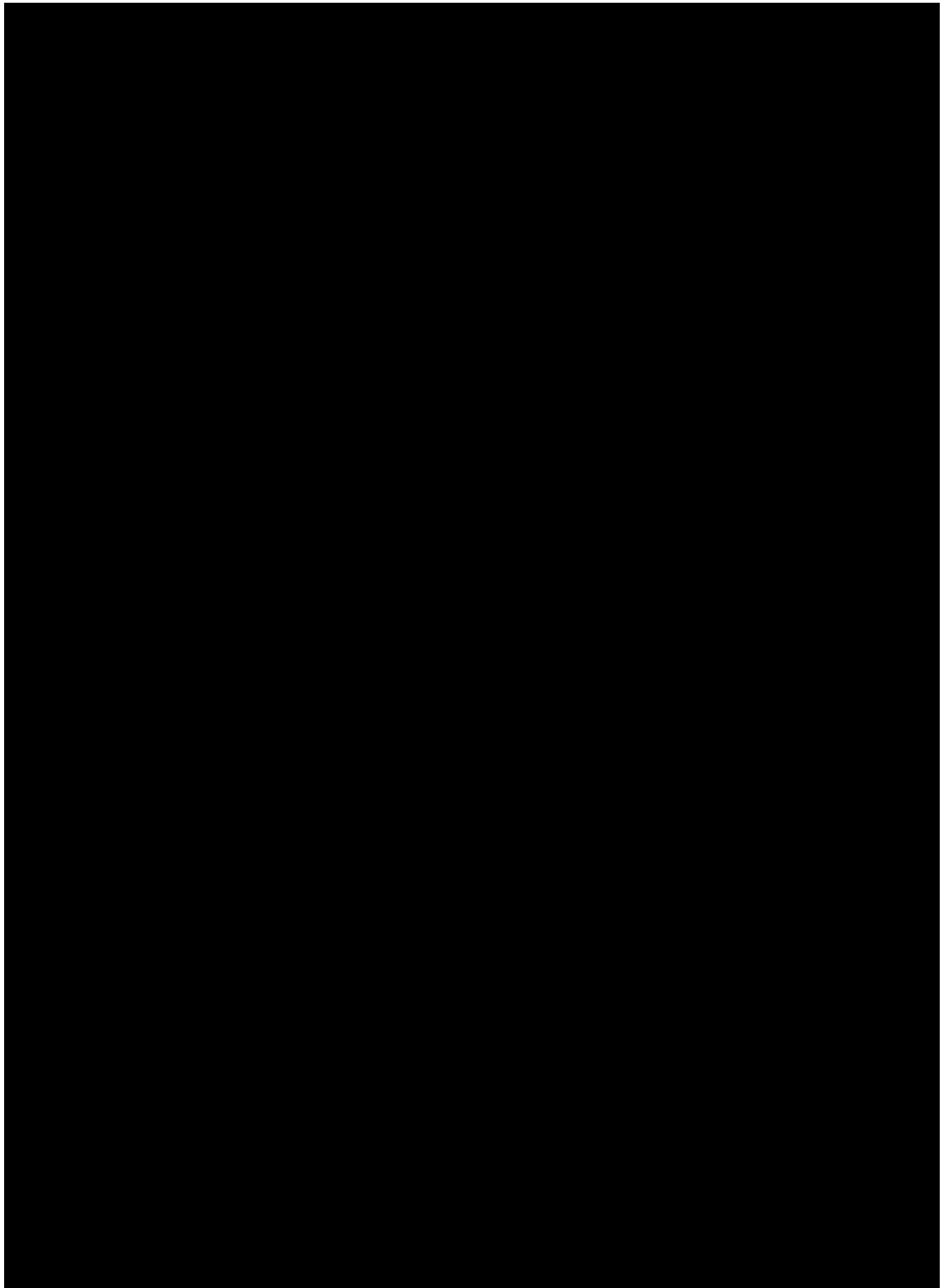


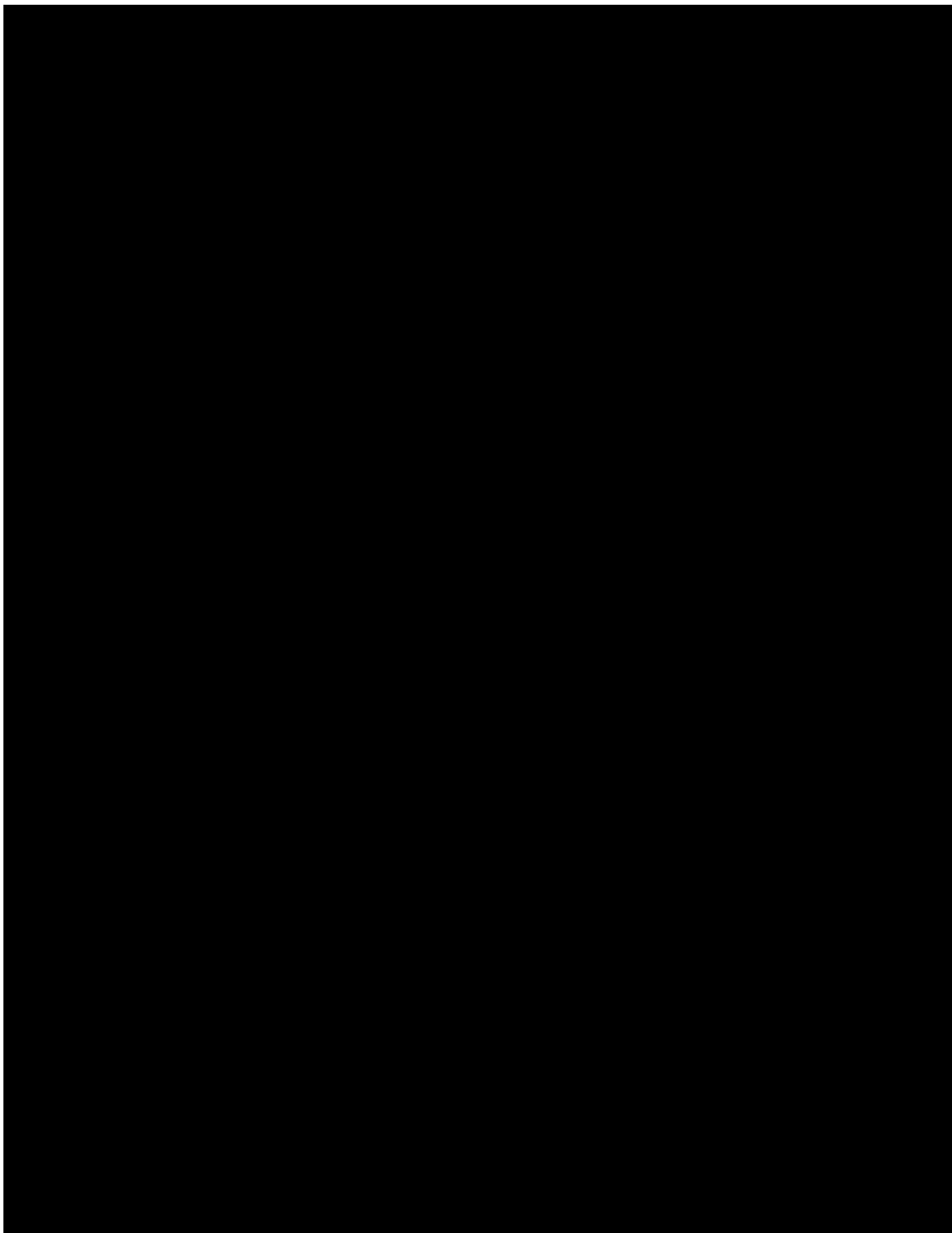




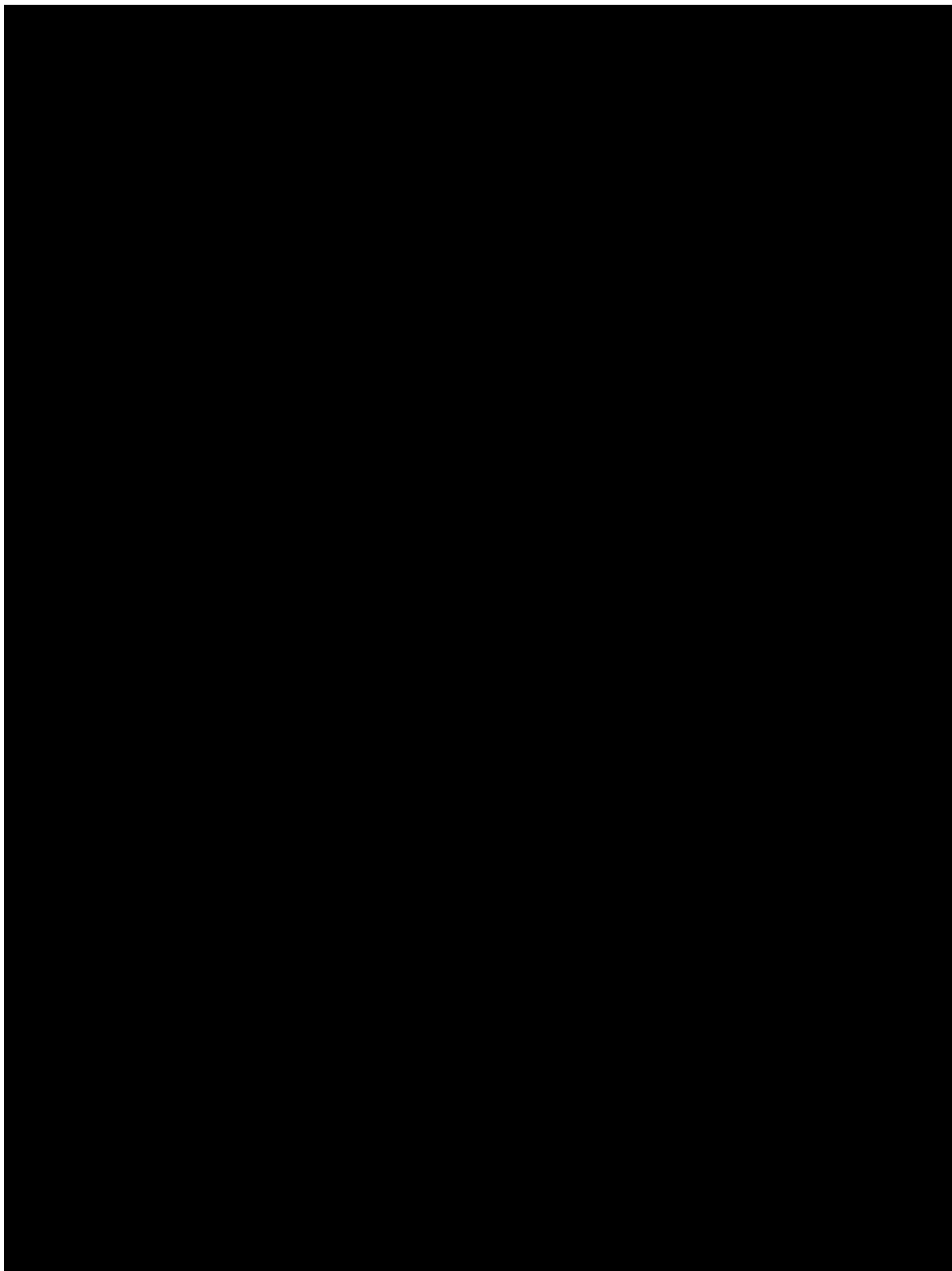
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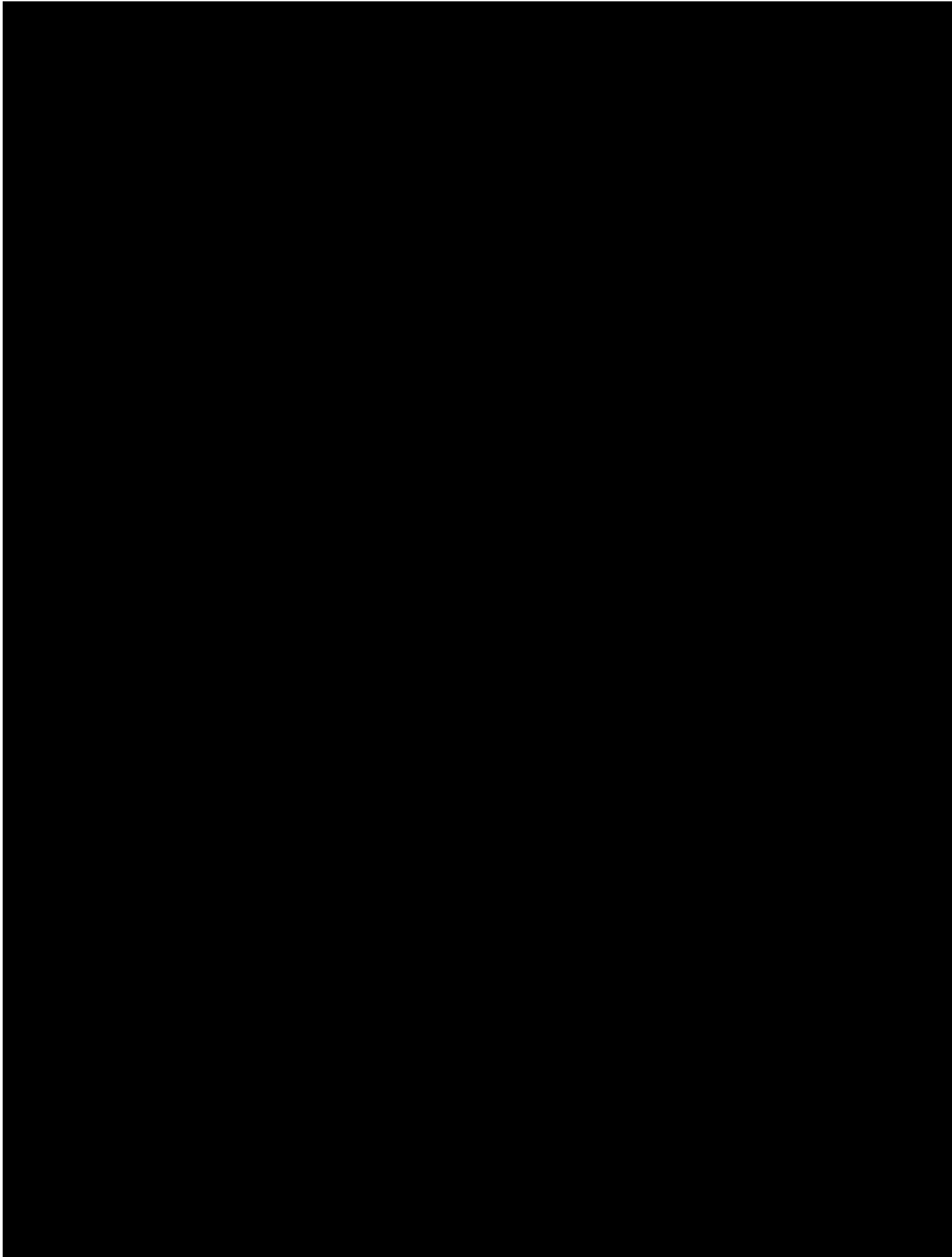




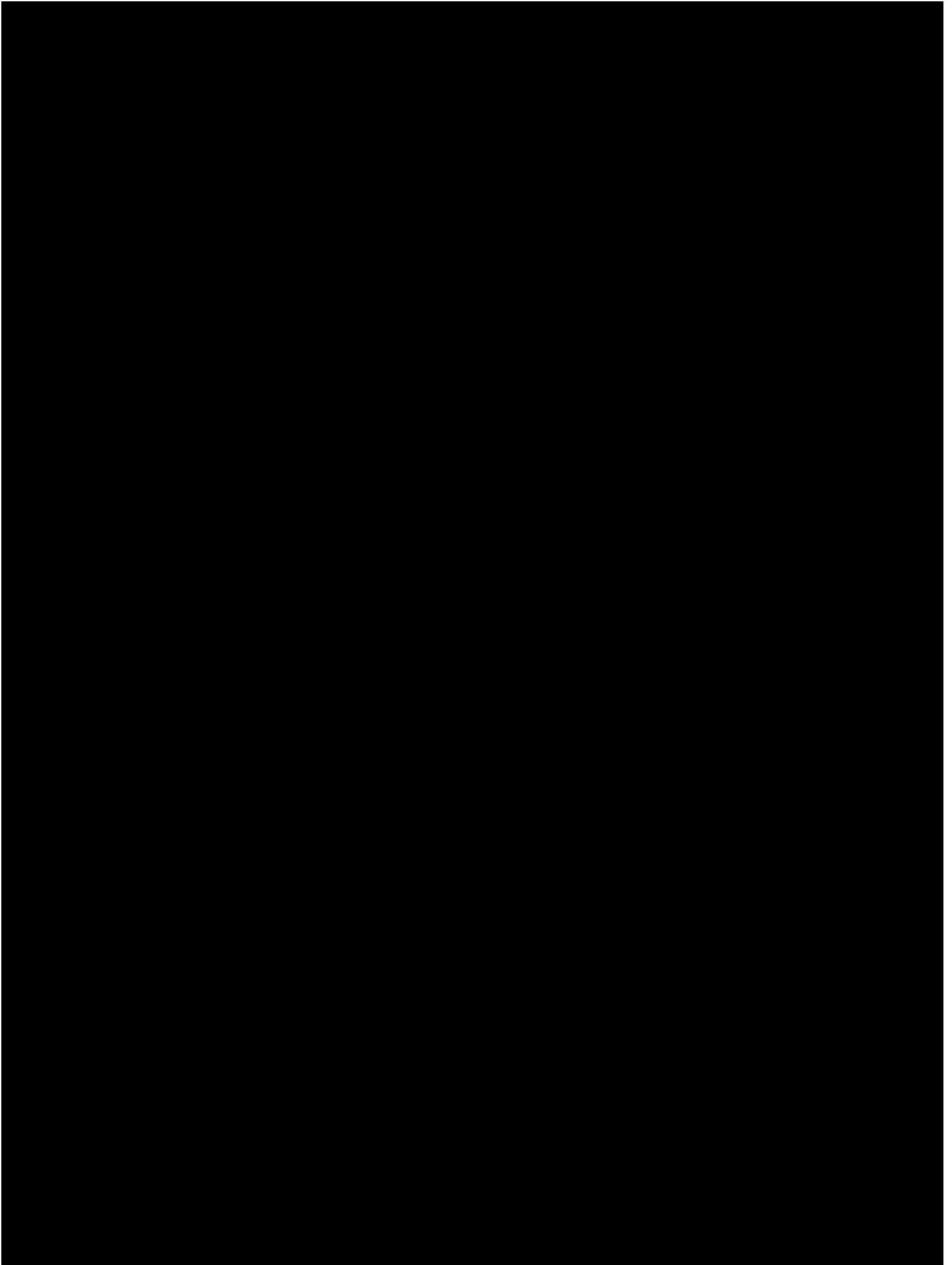


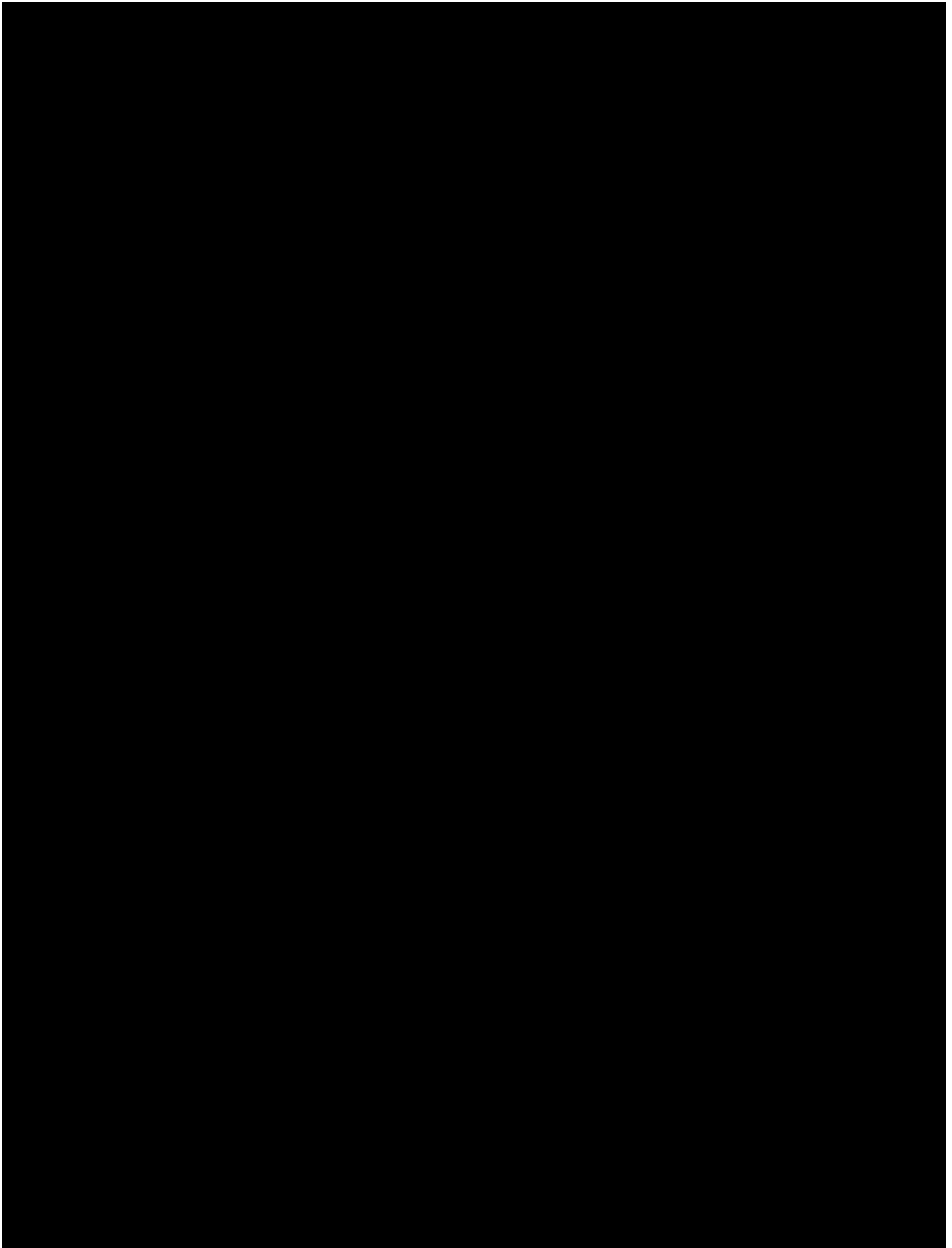
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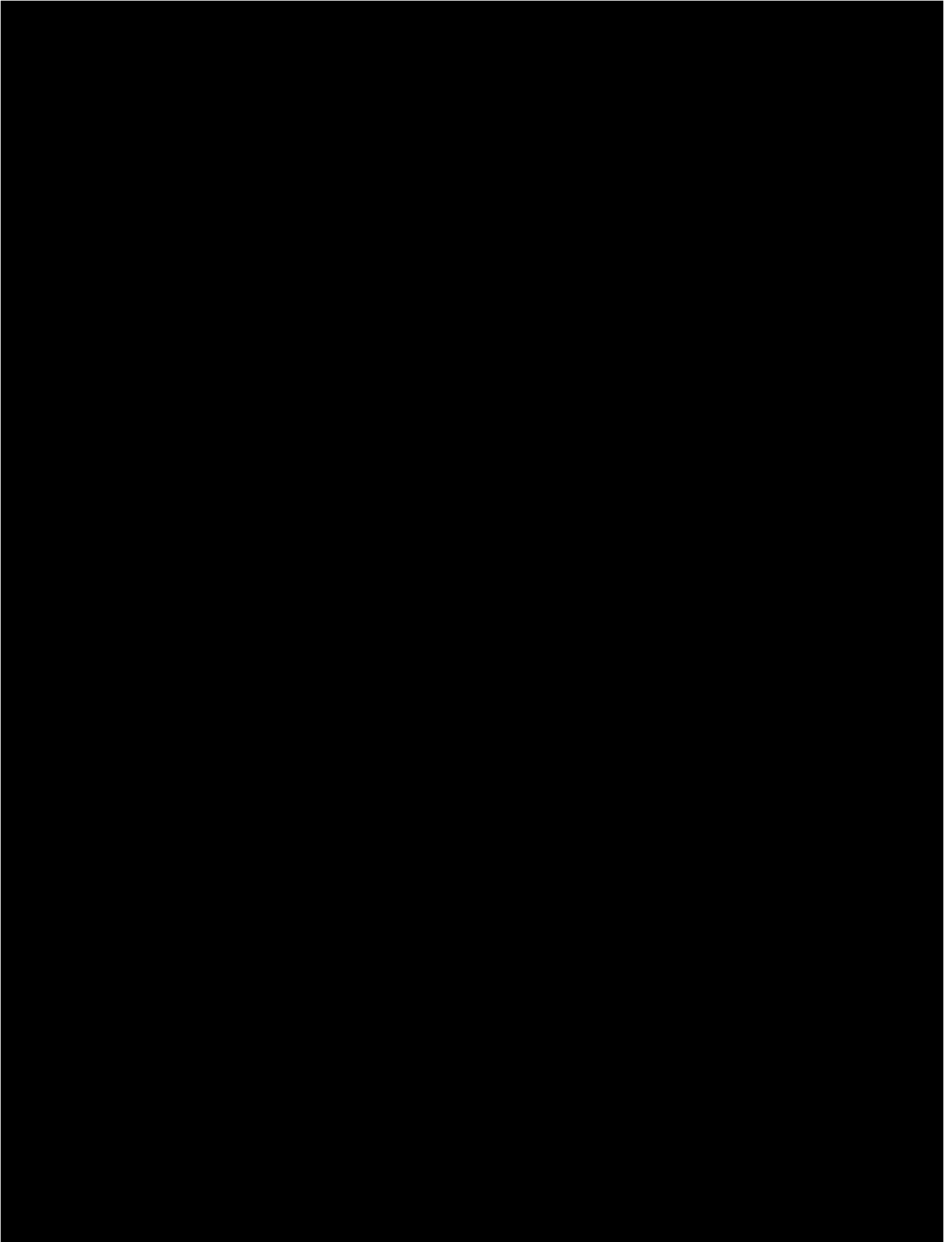


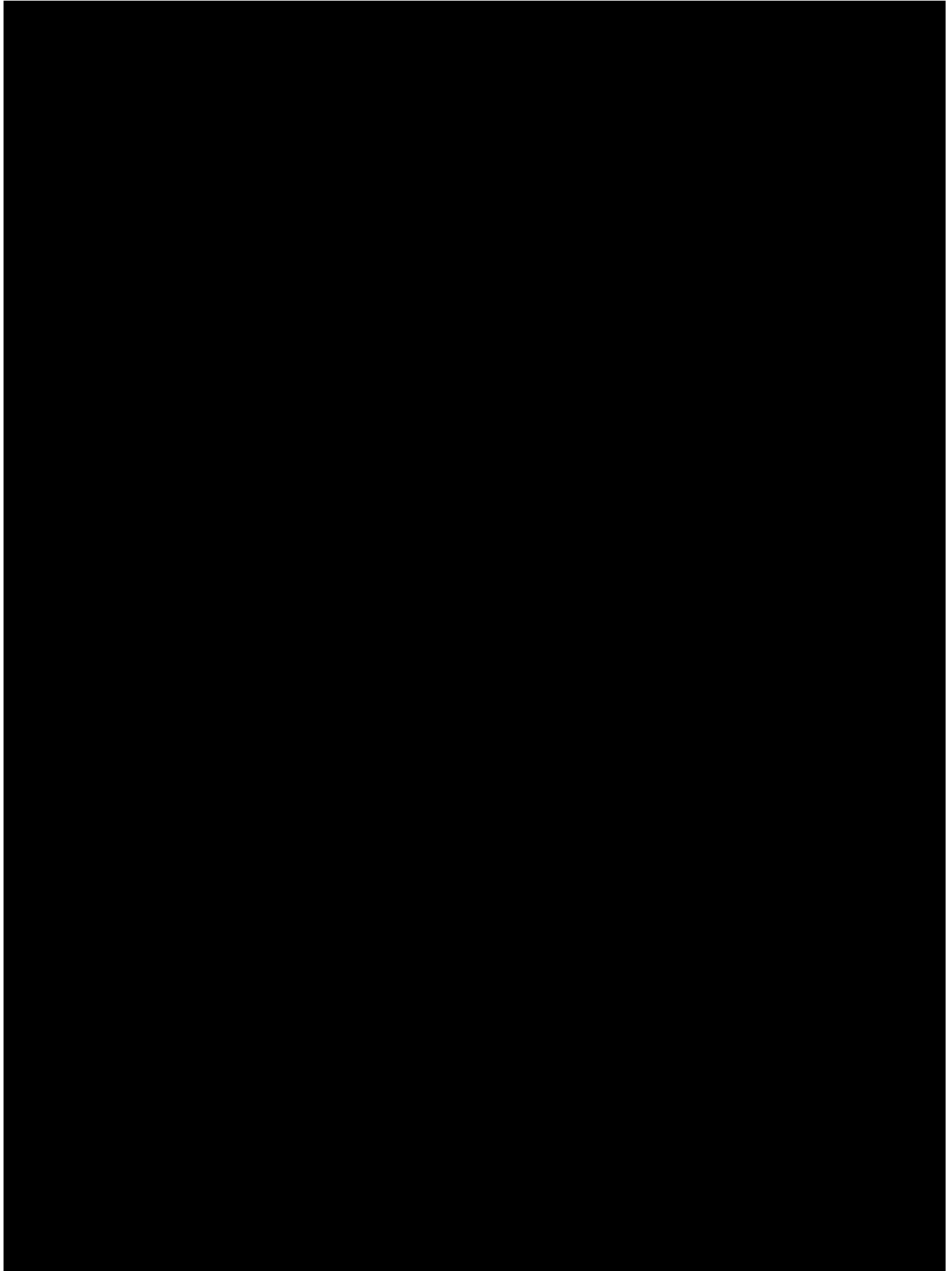


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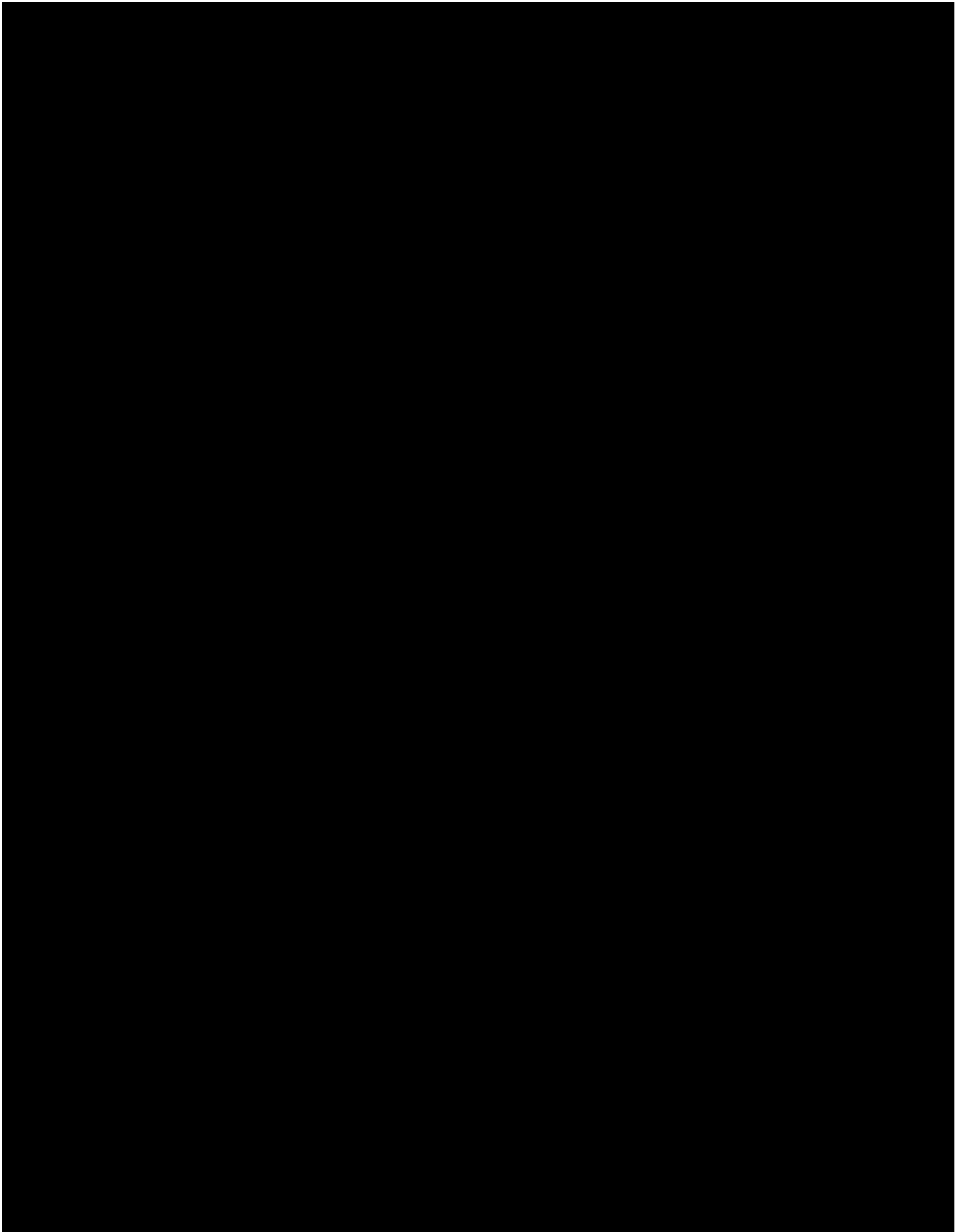


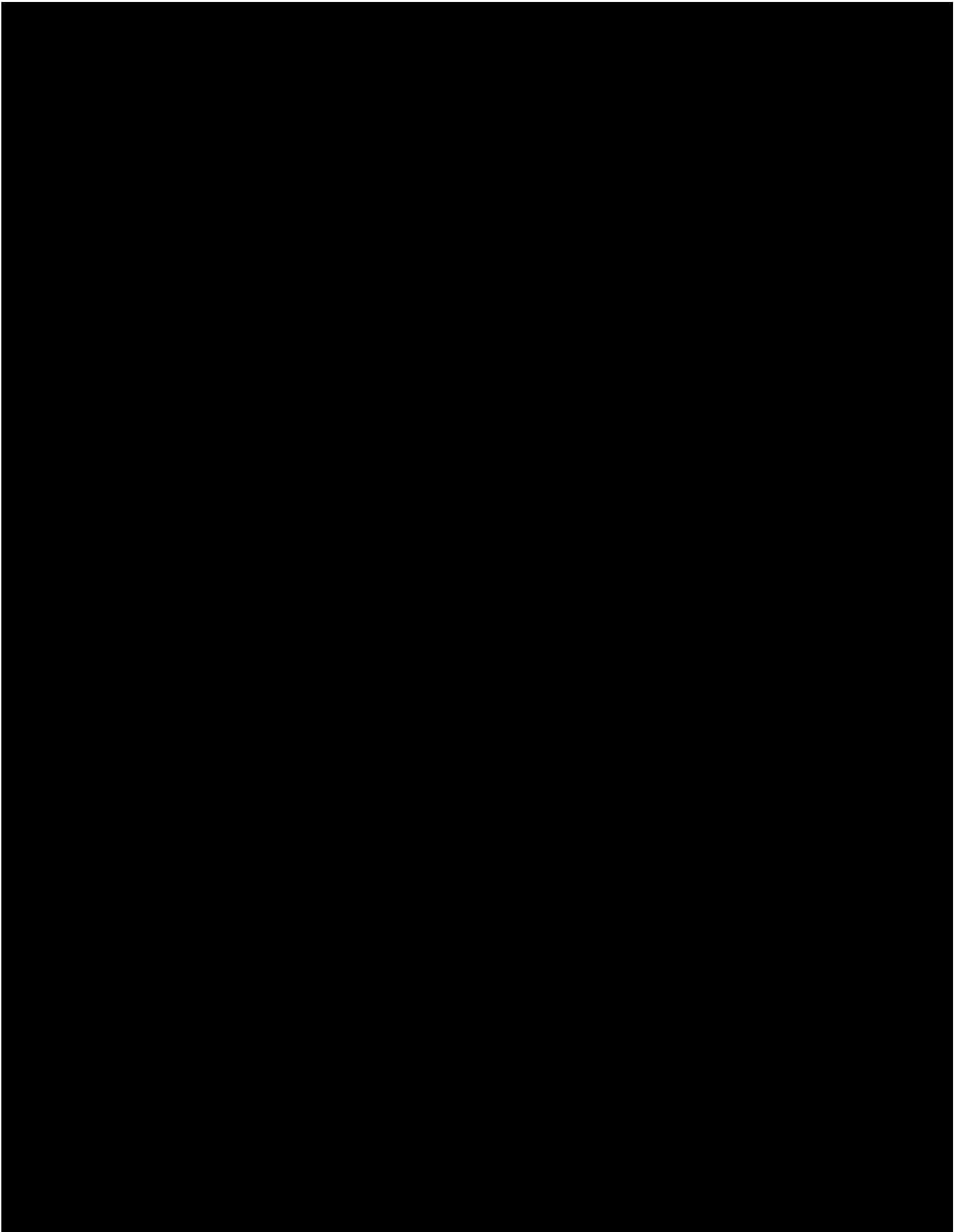


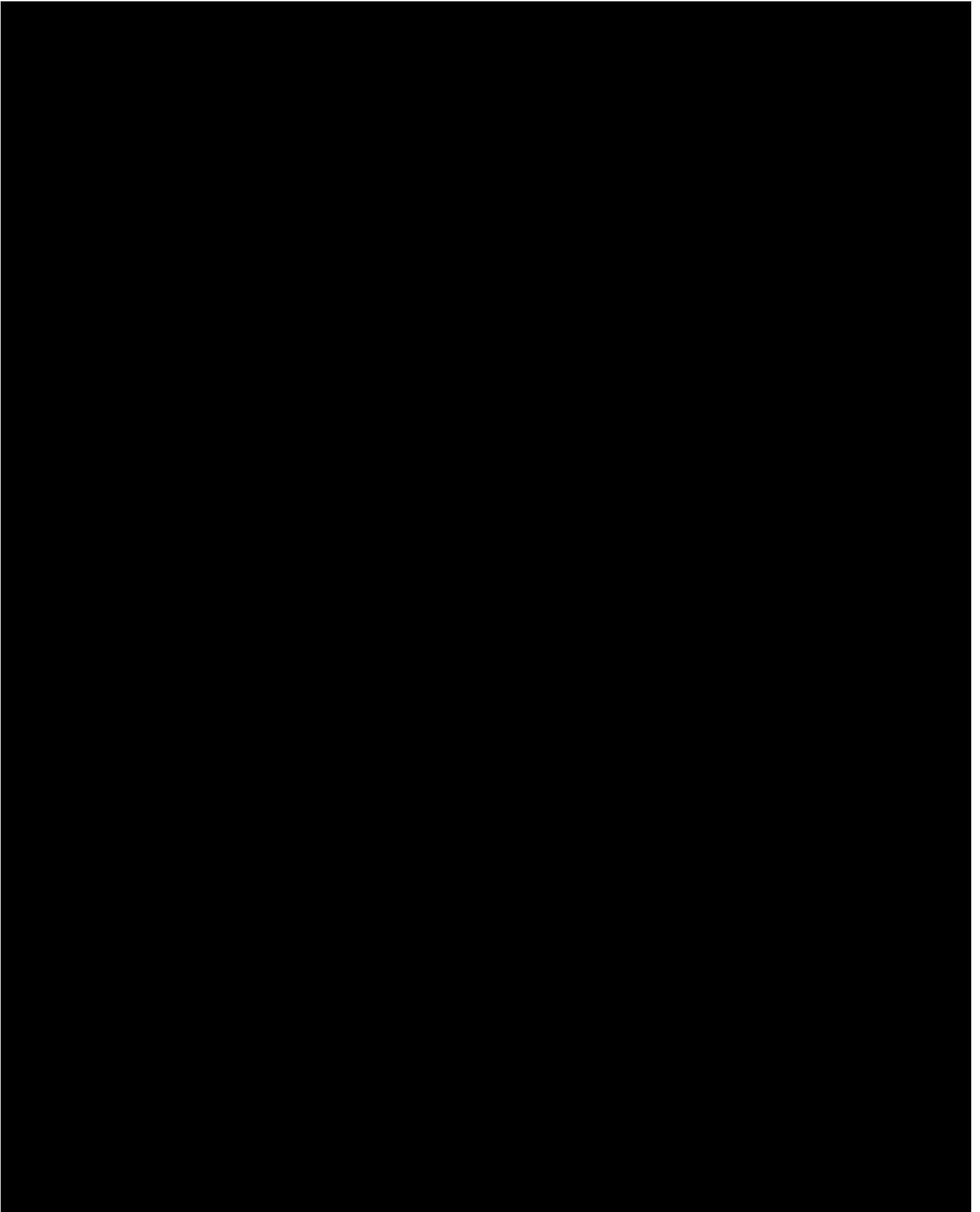




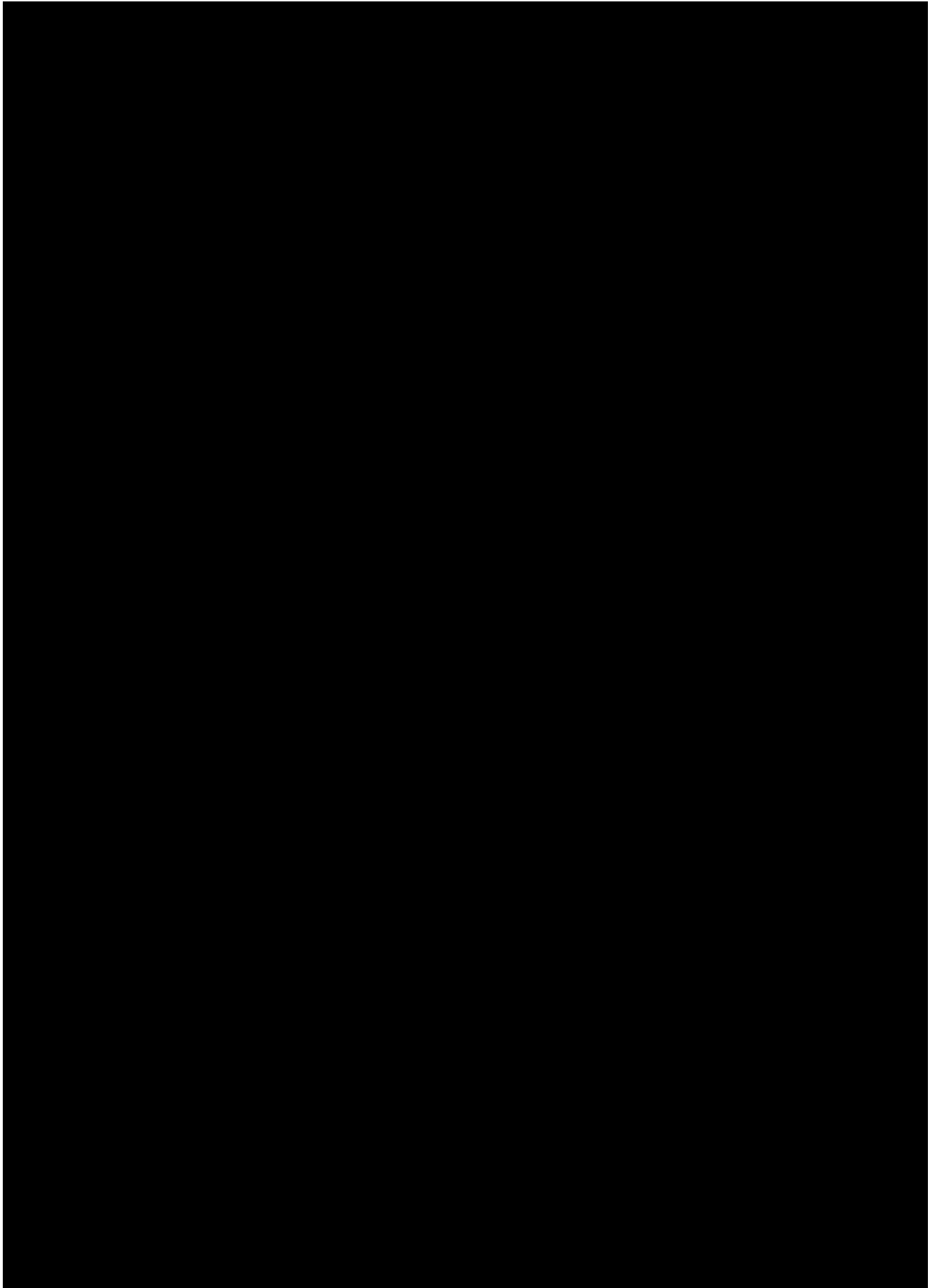
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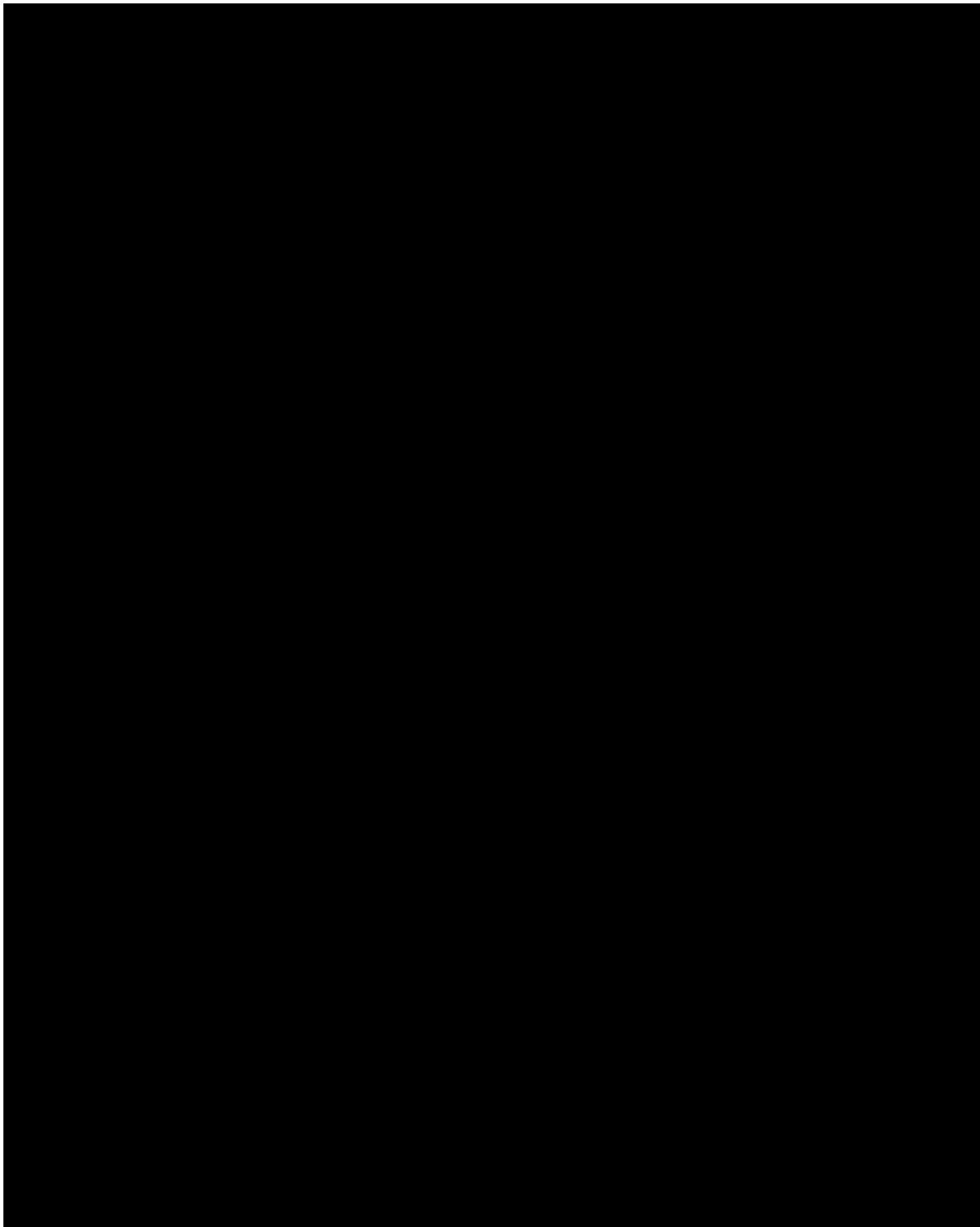


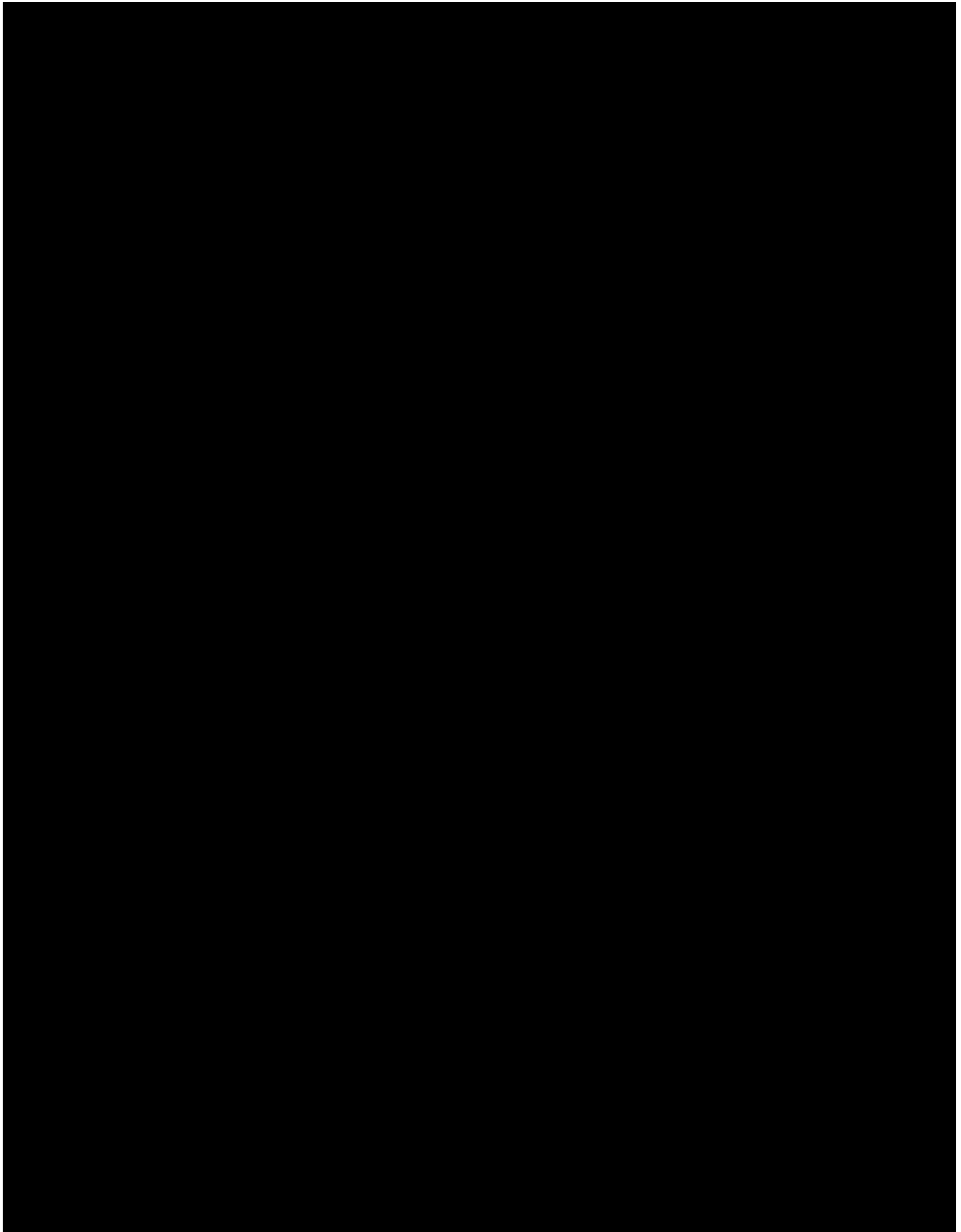


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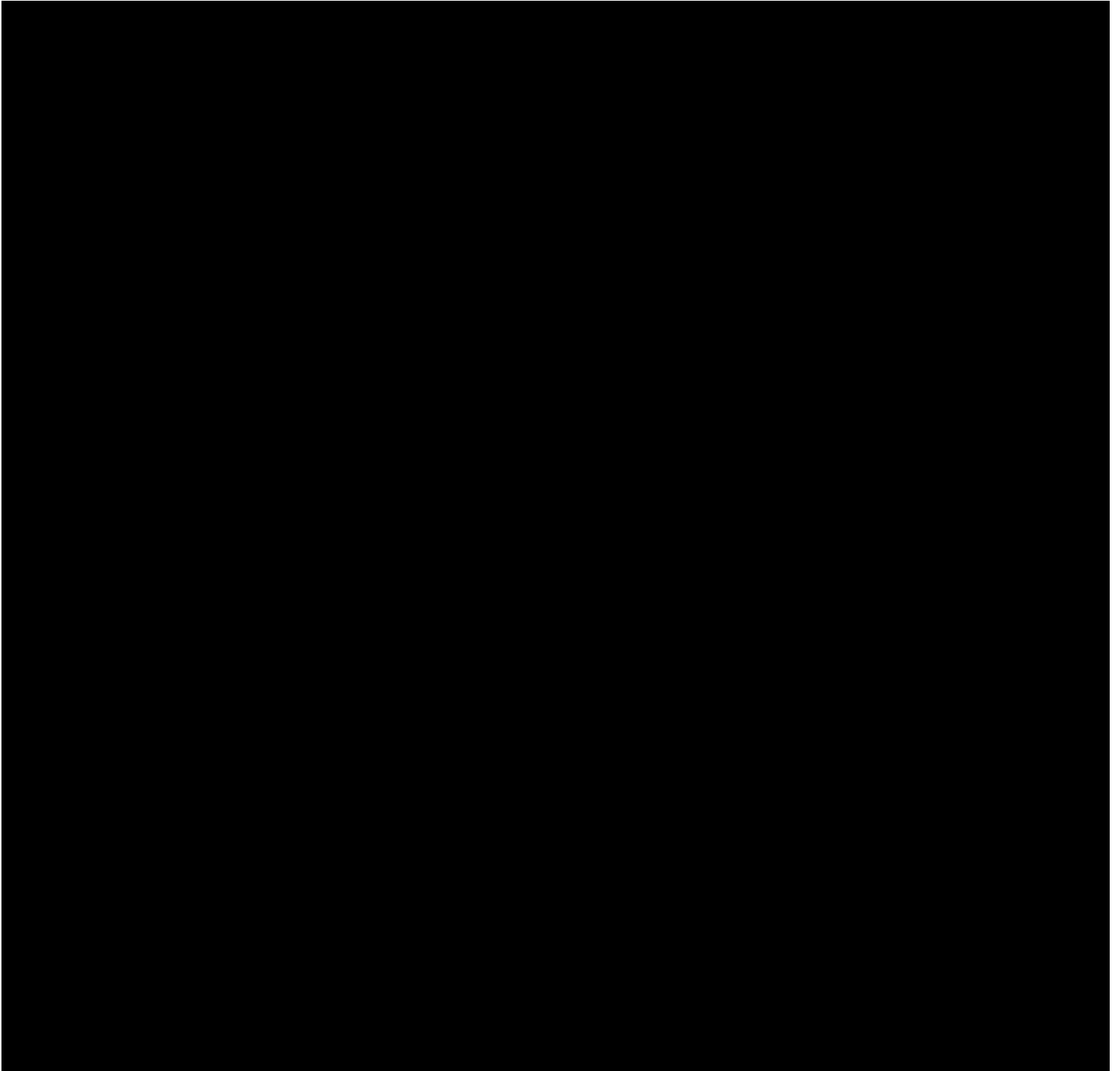


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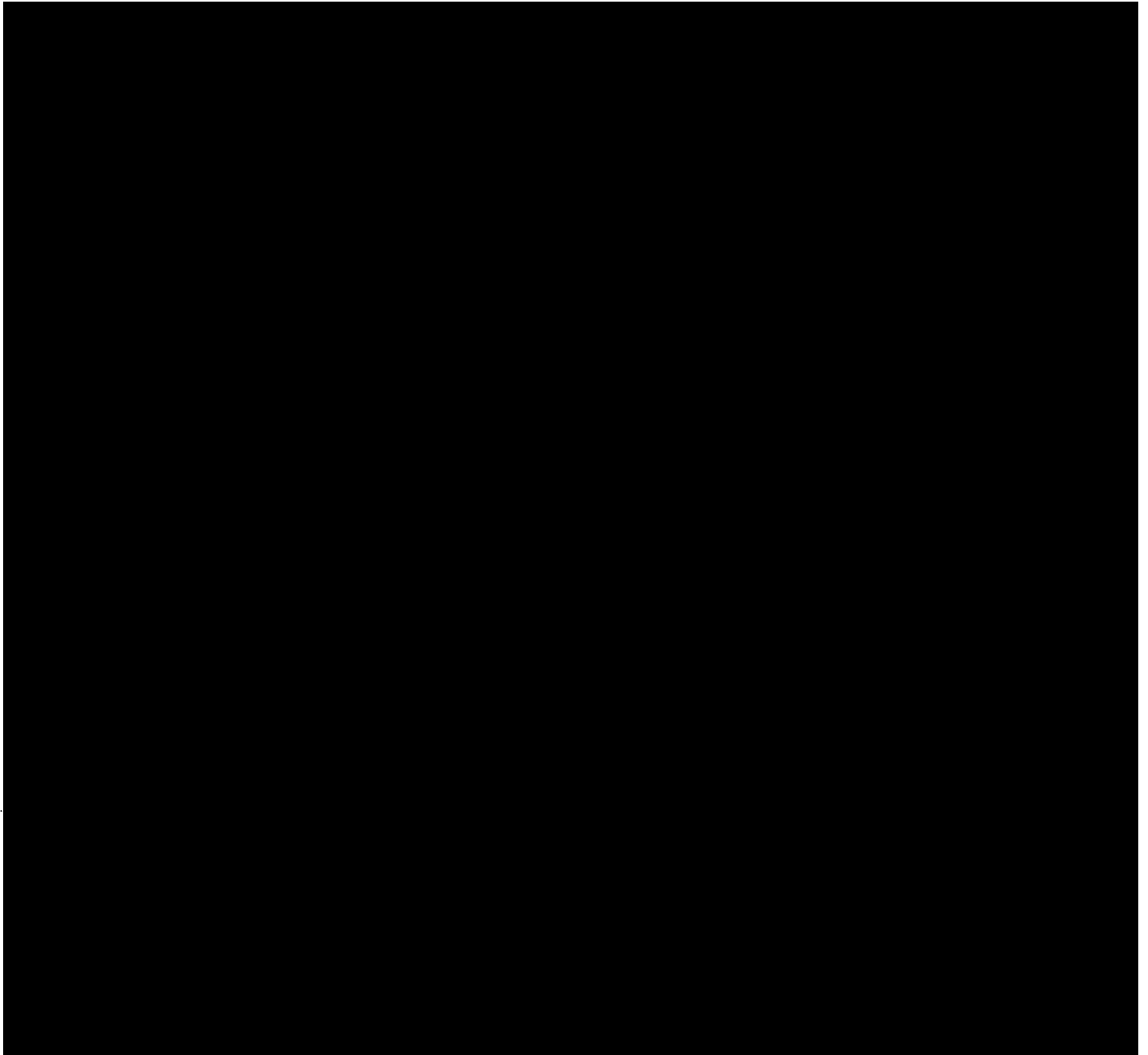
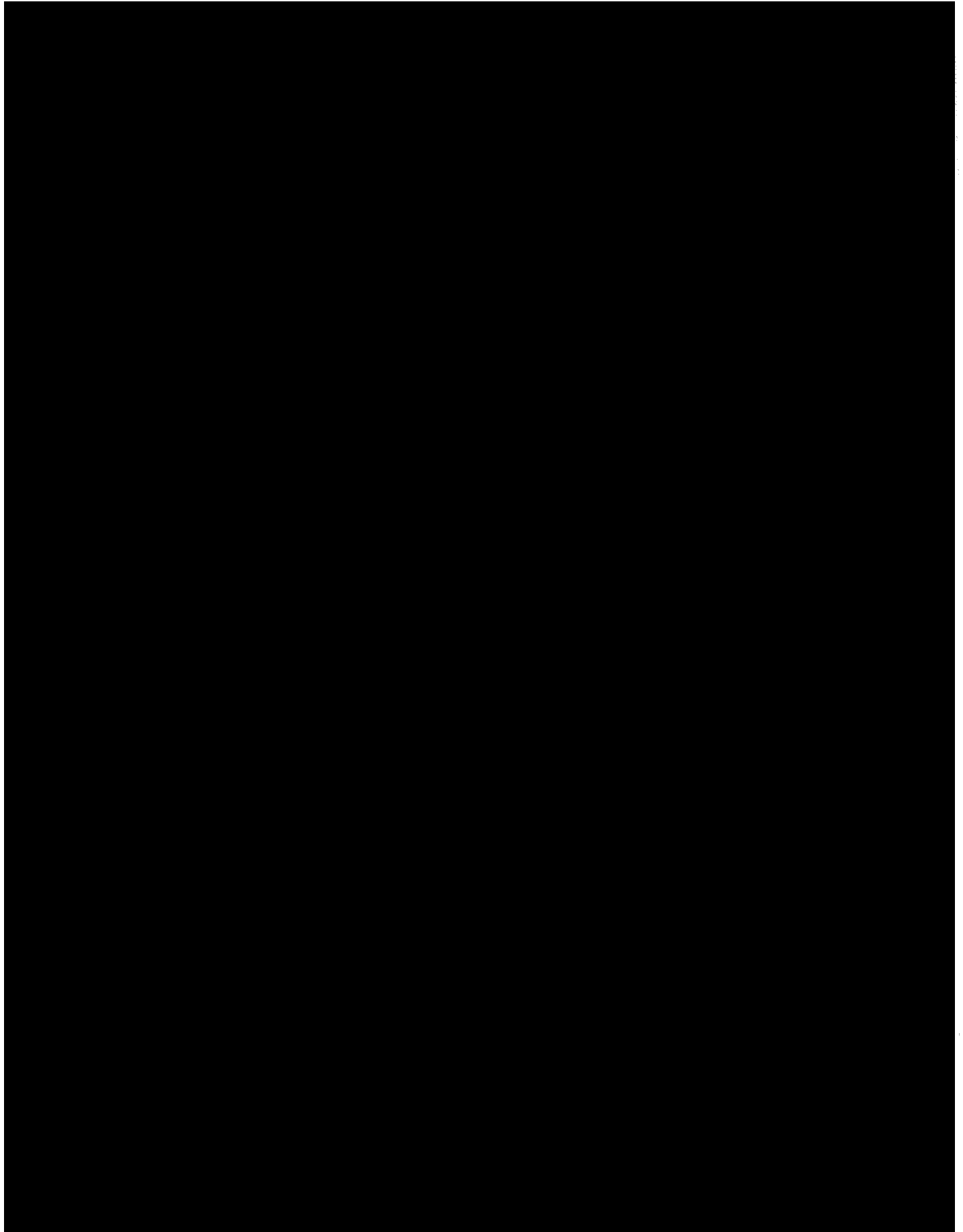
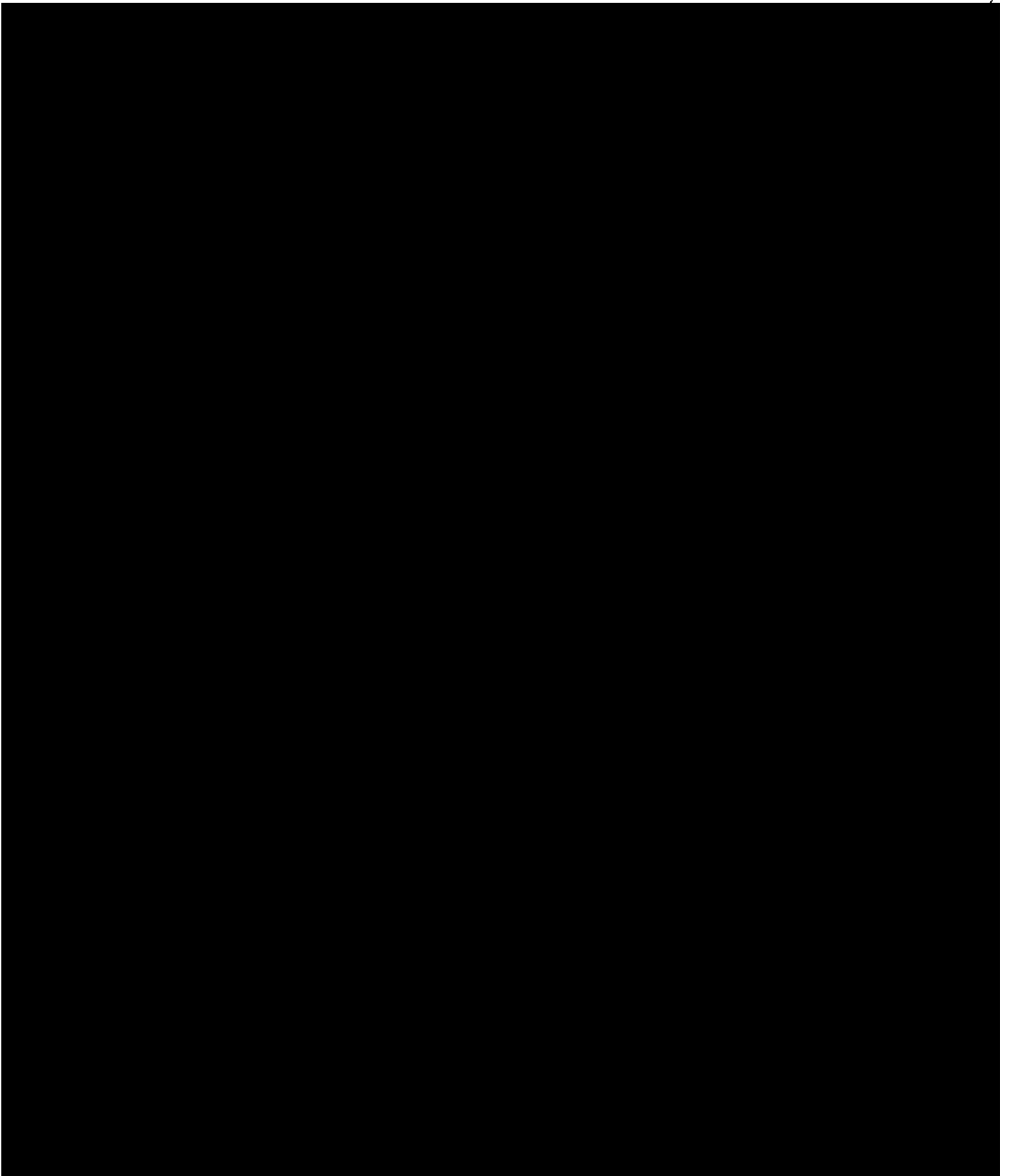
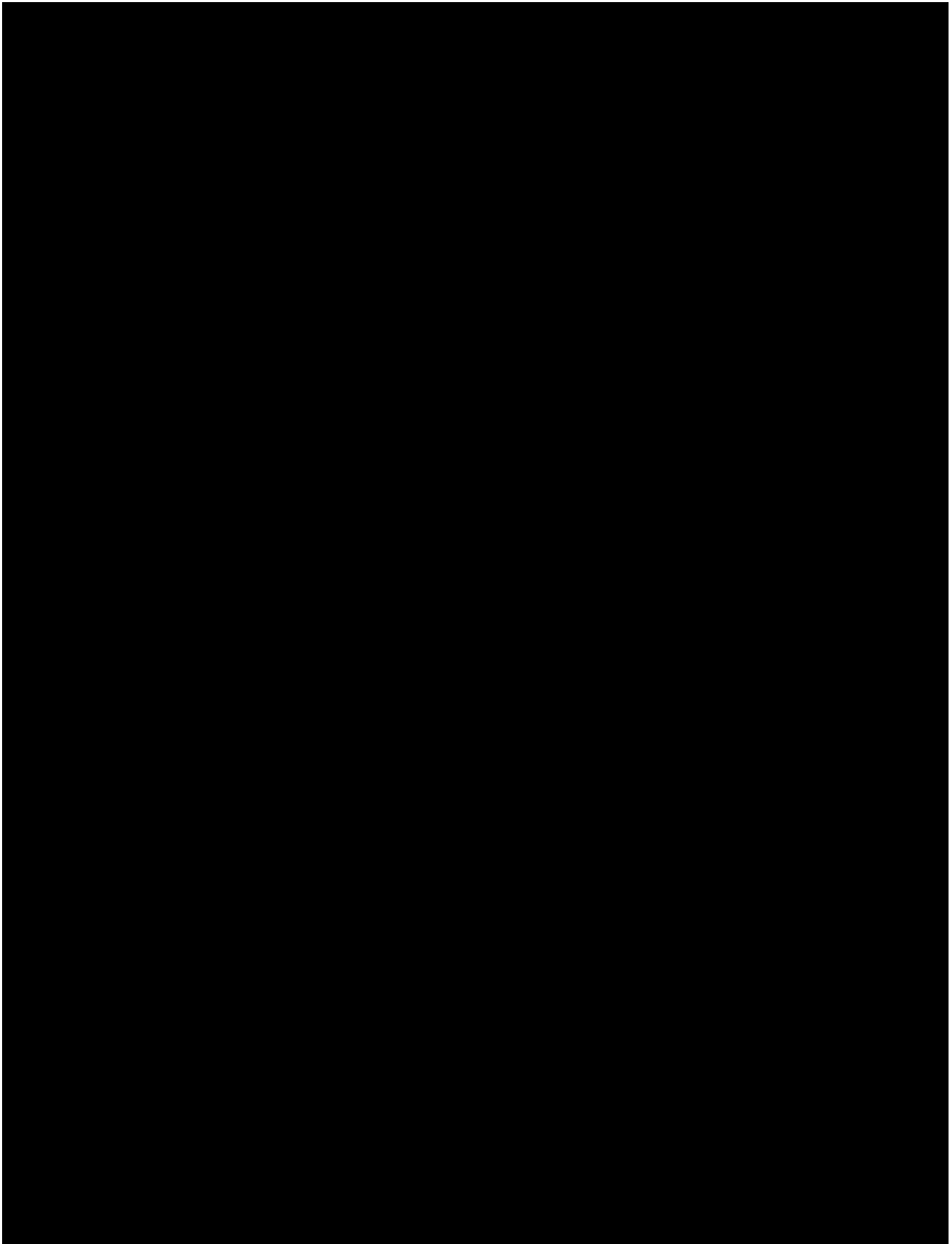
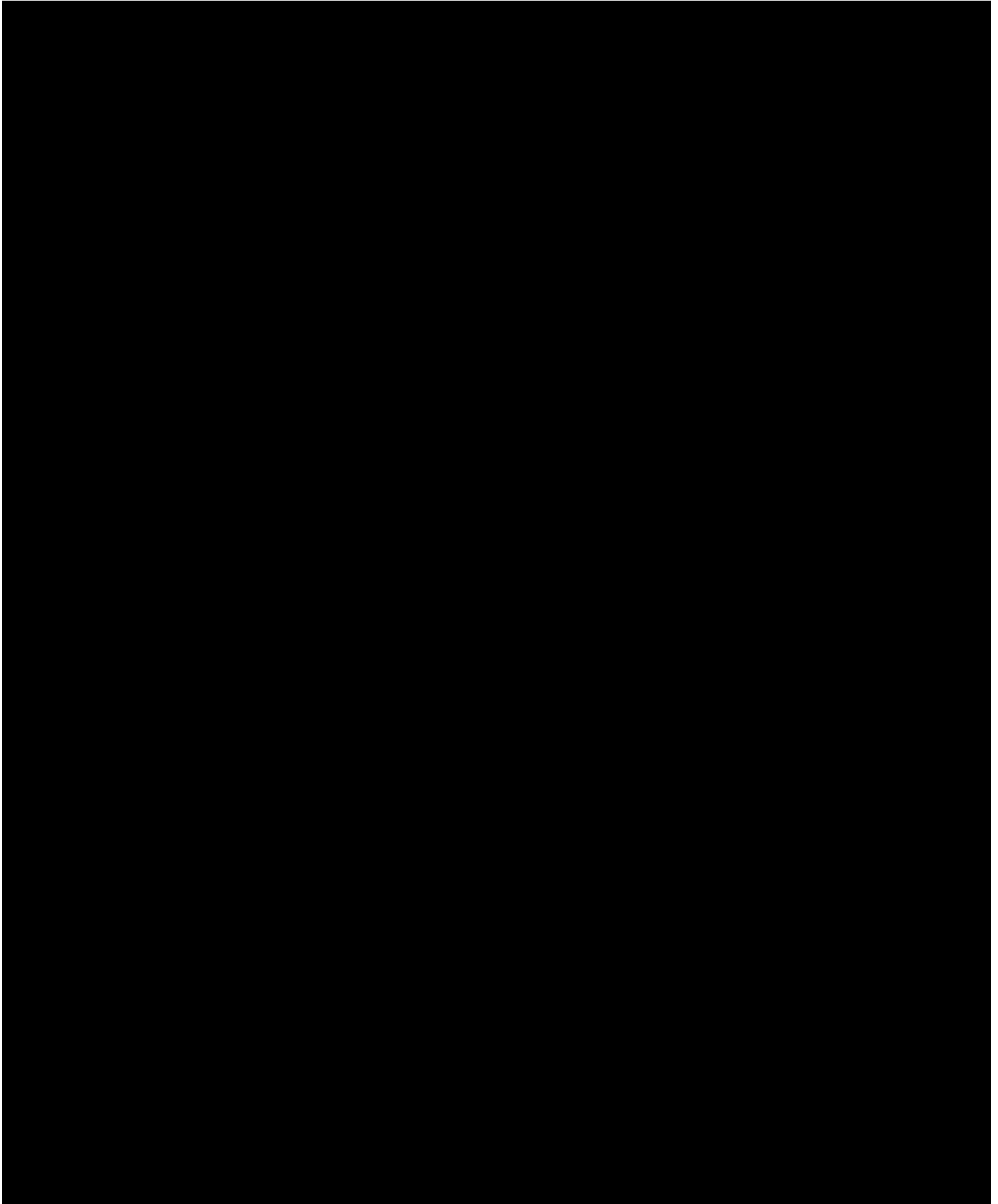


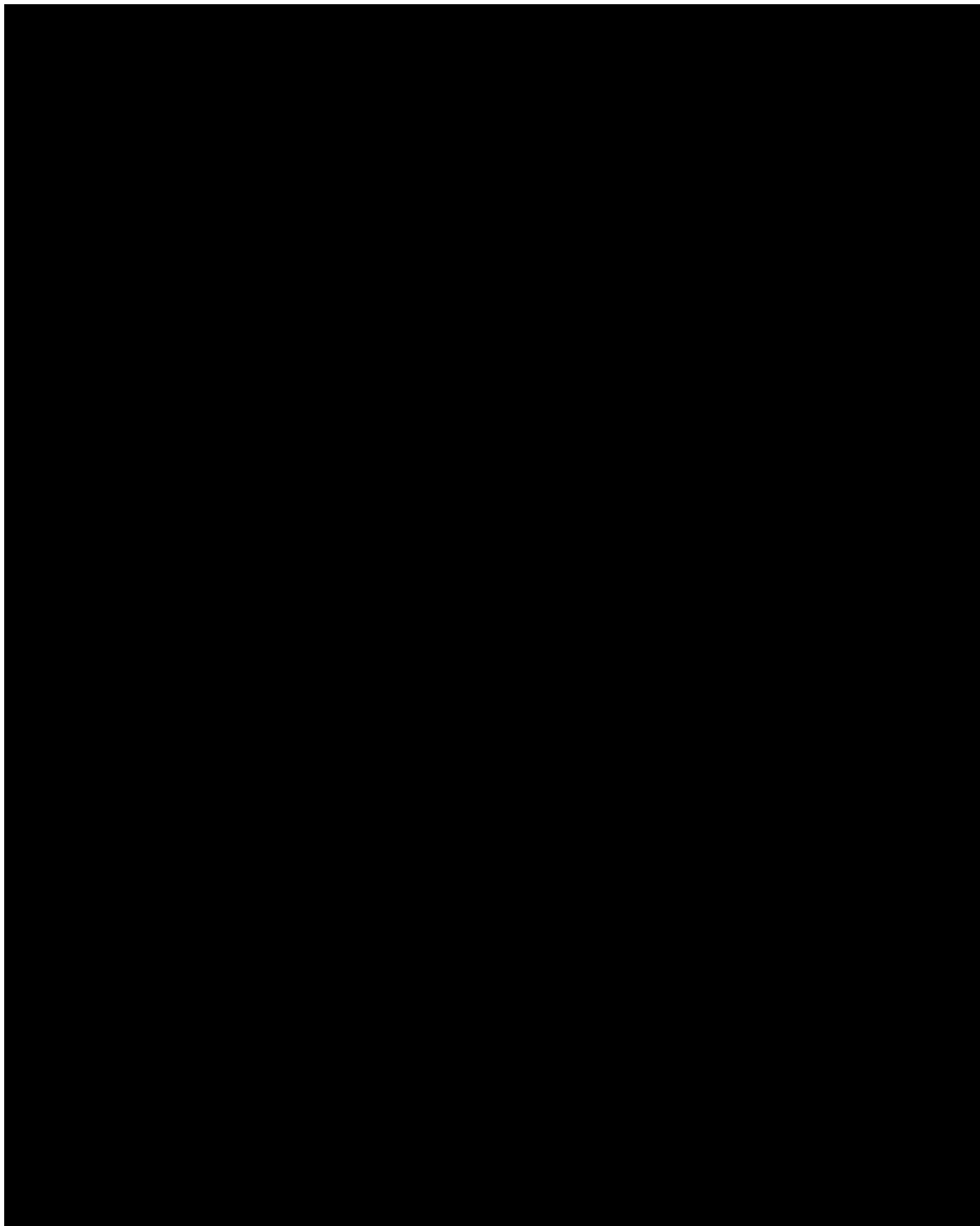
EXHIBIT A

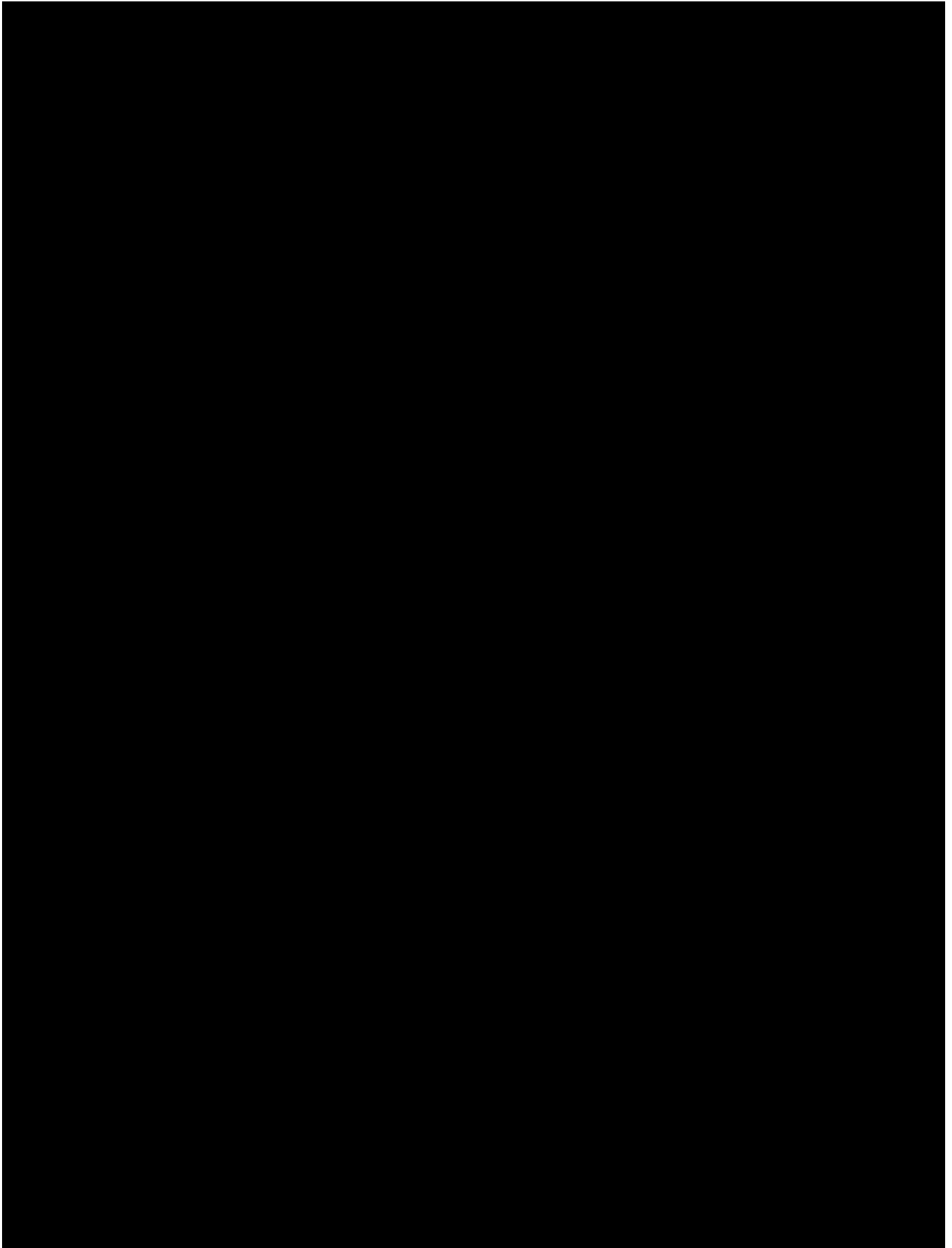


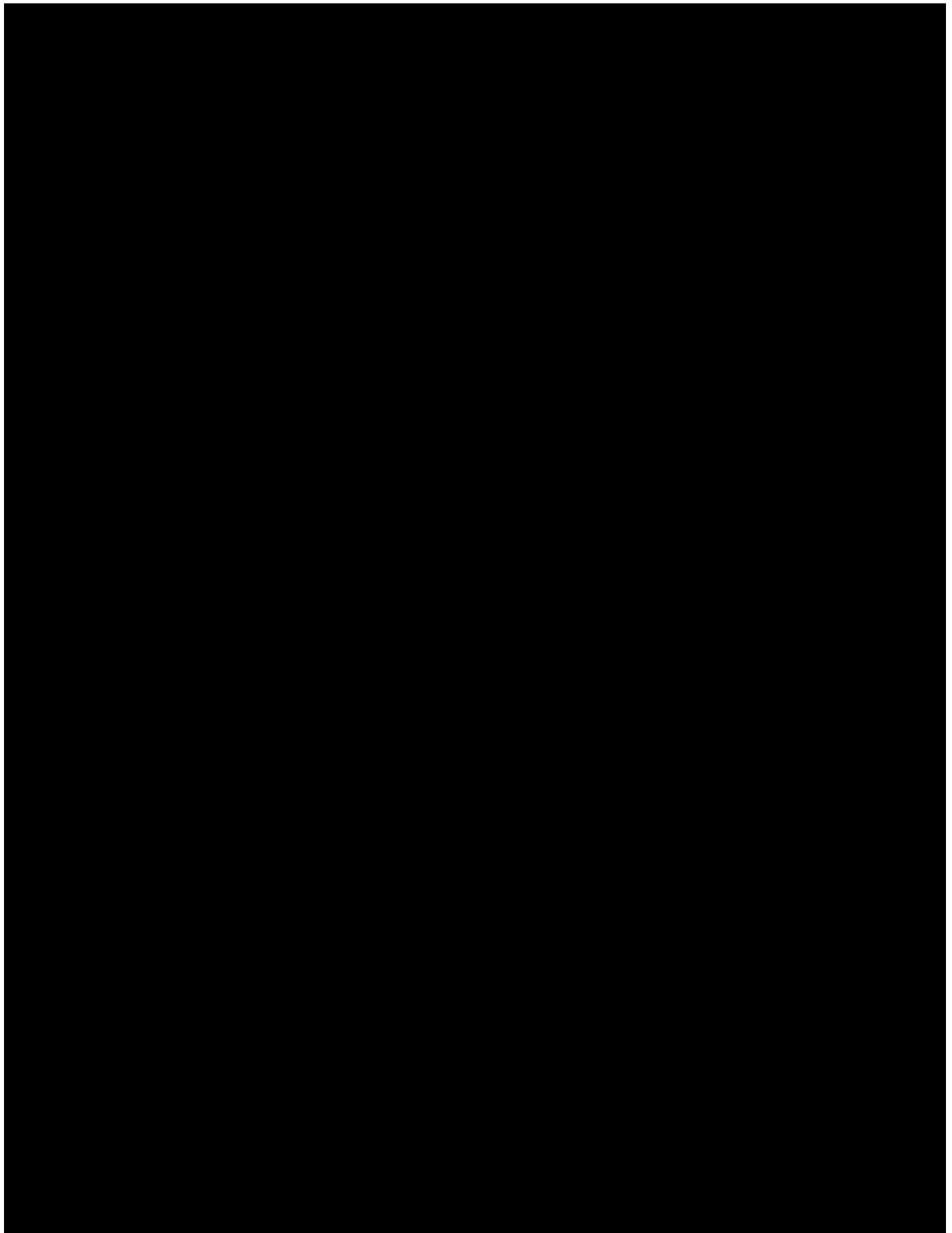


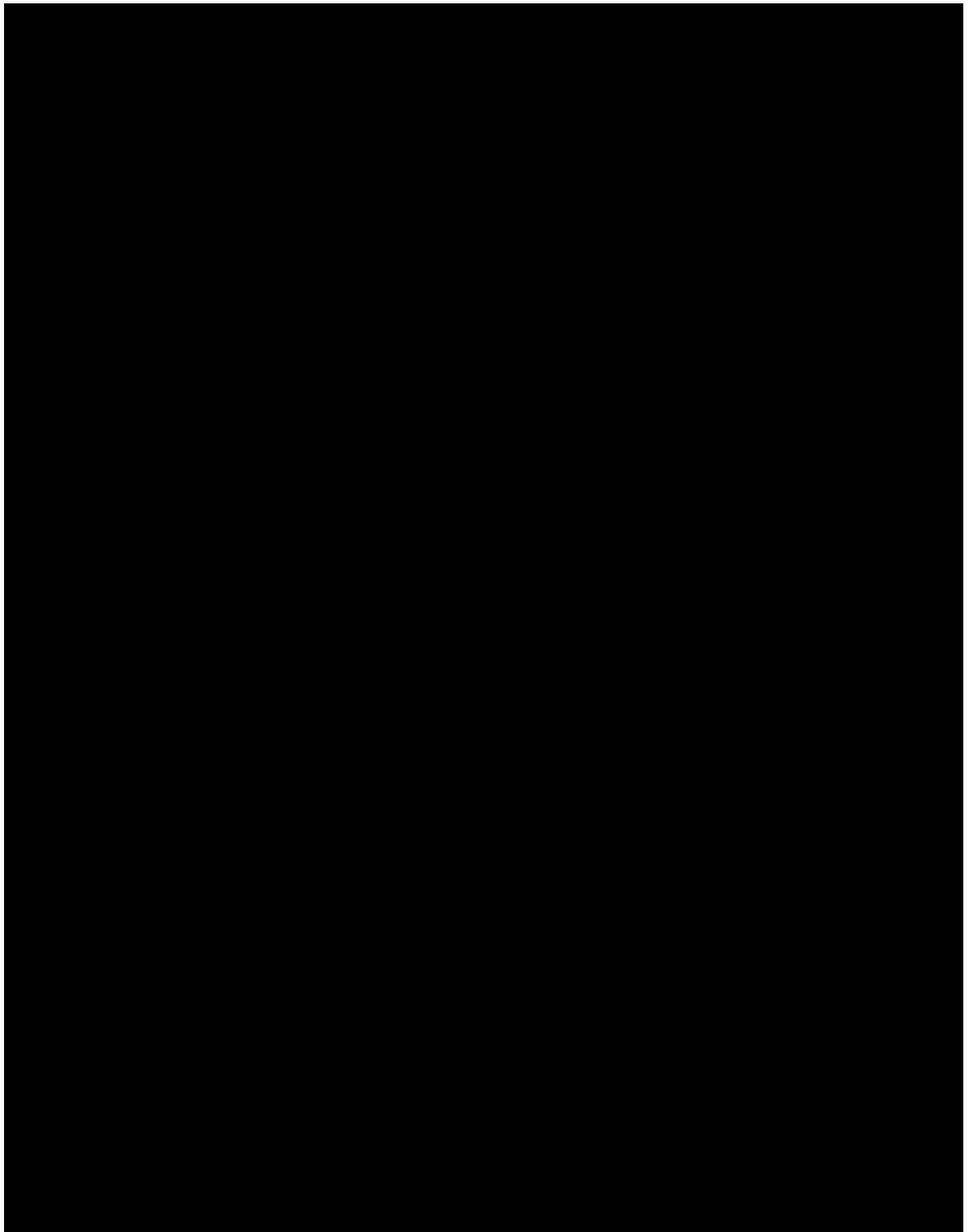


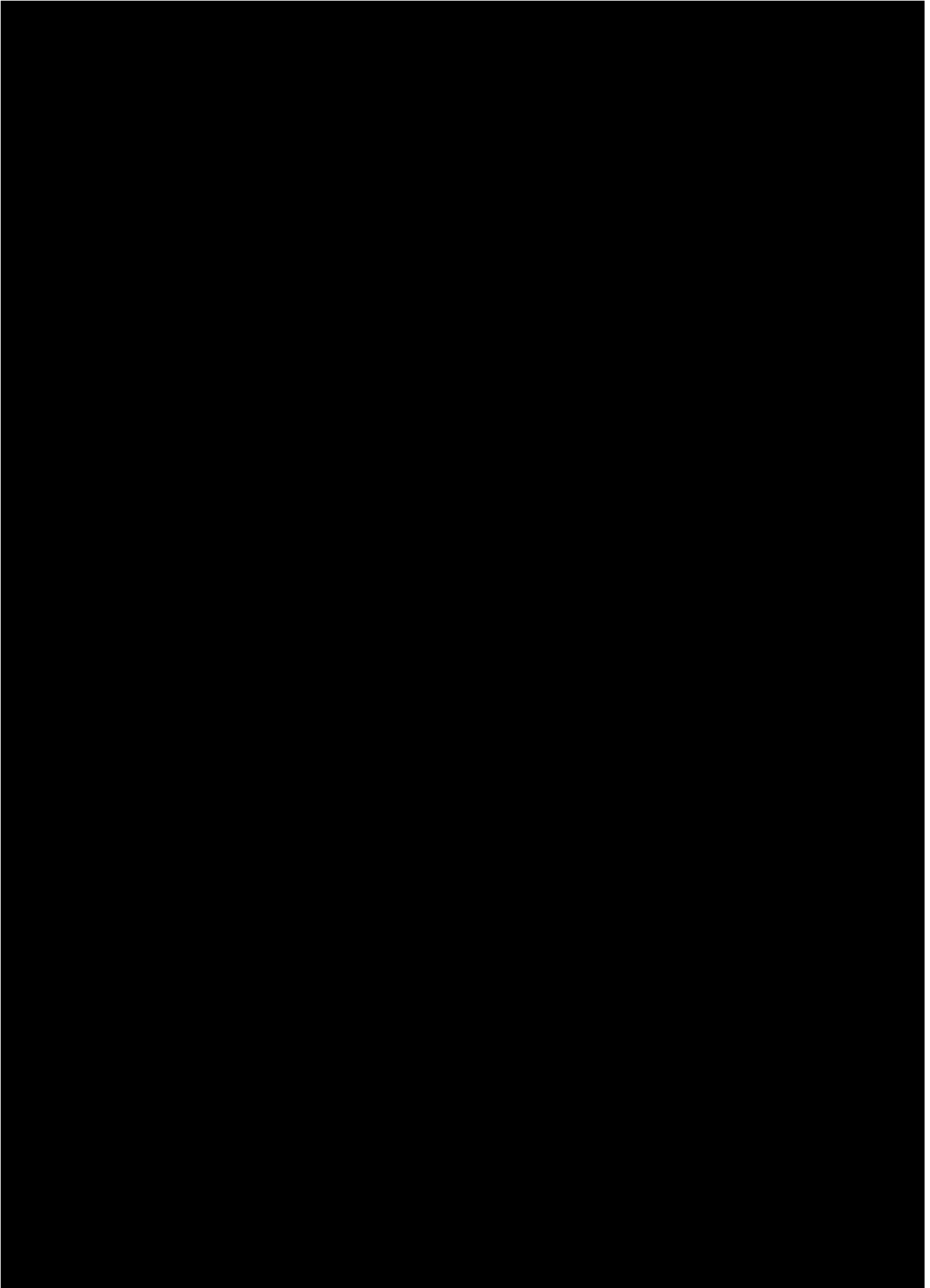


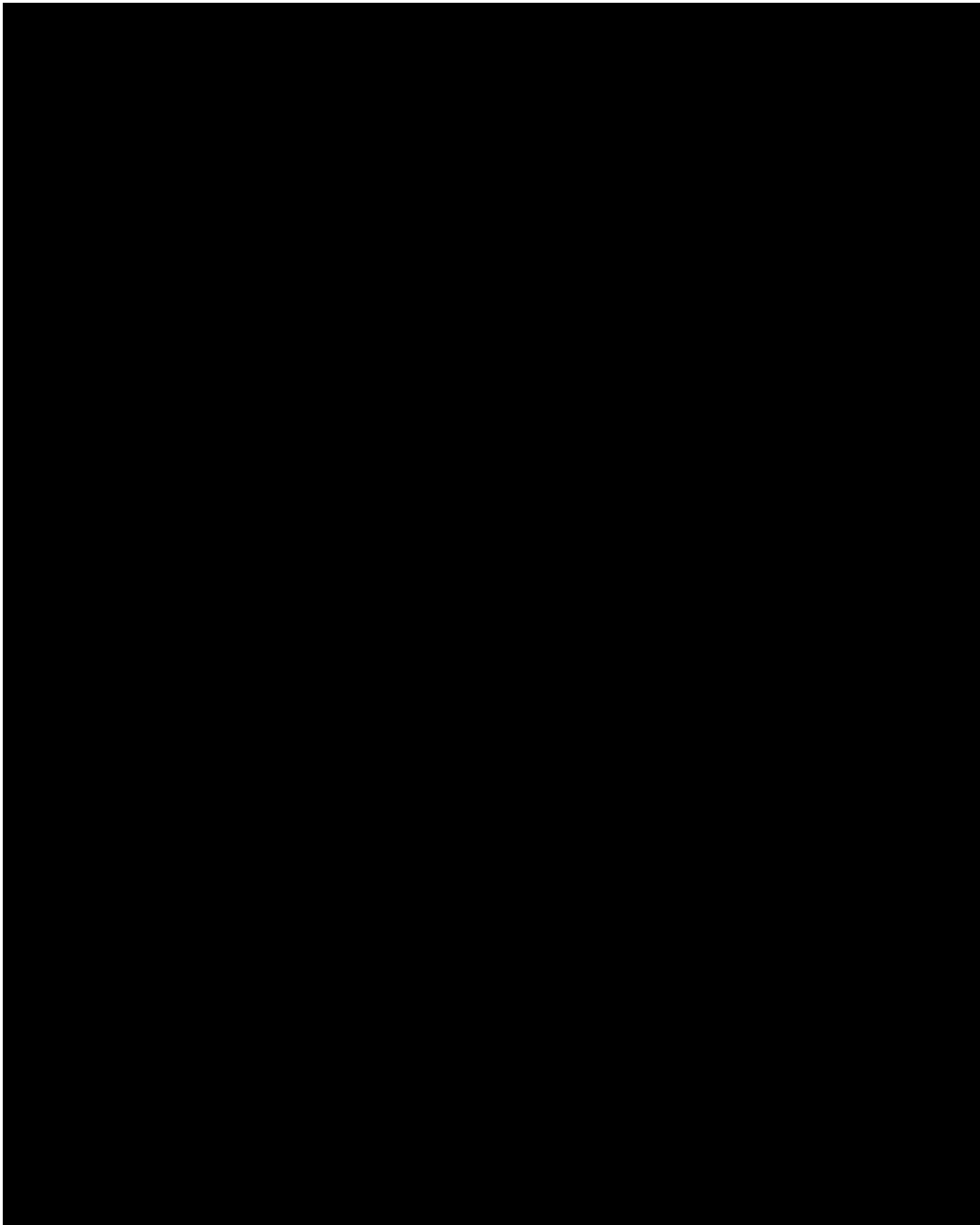


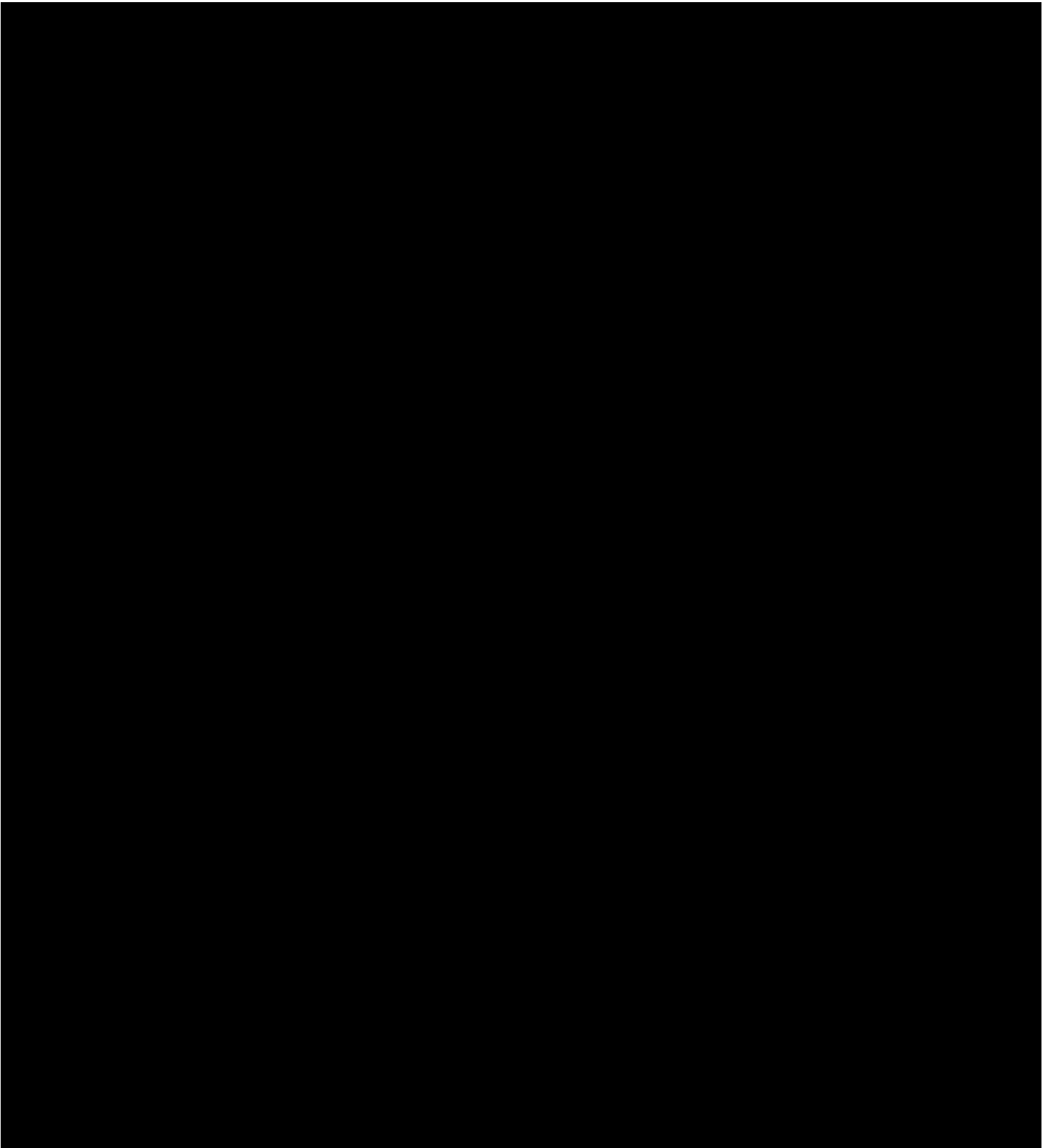




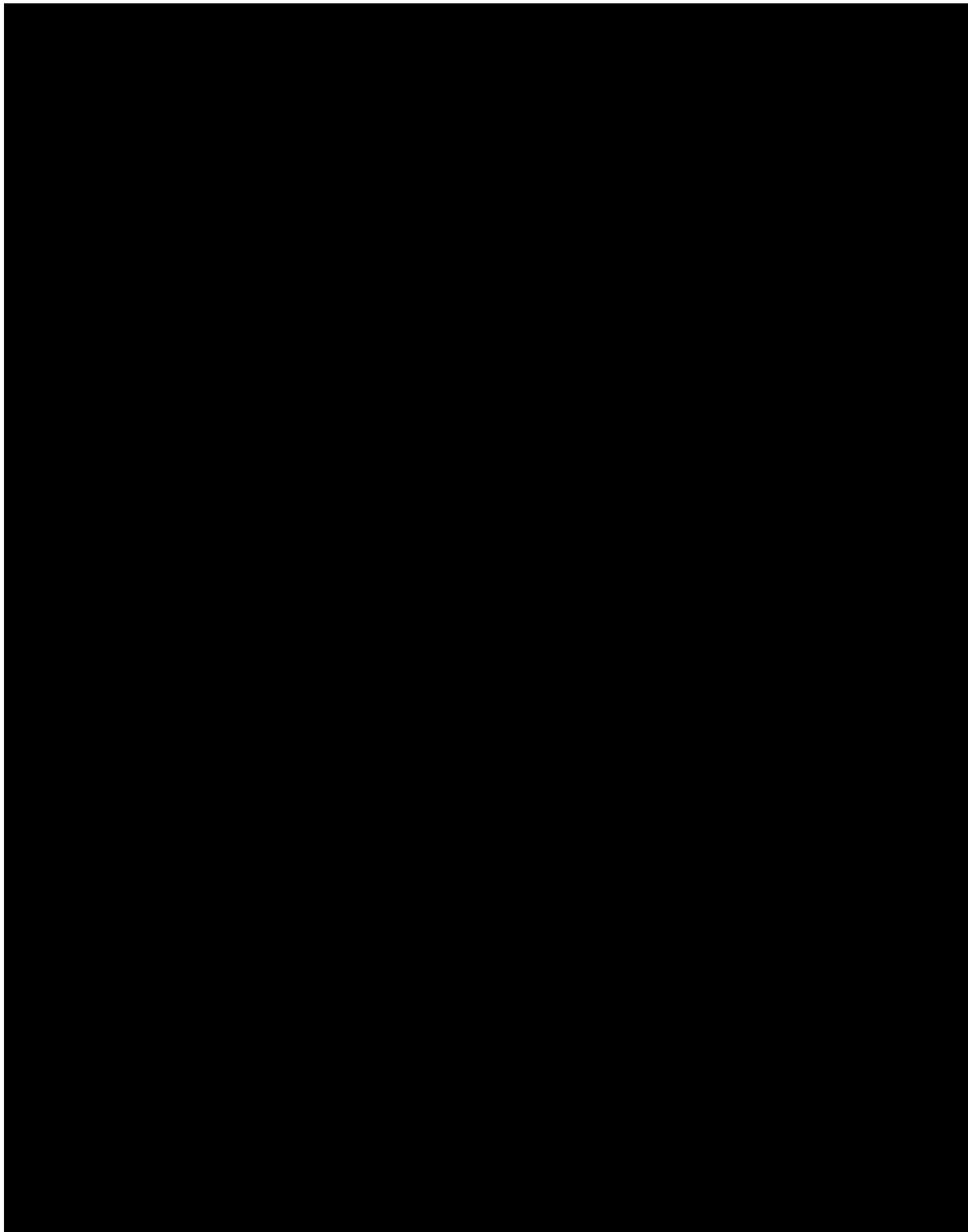


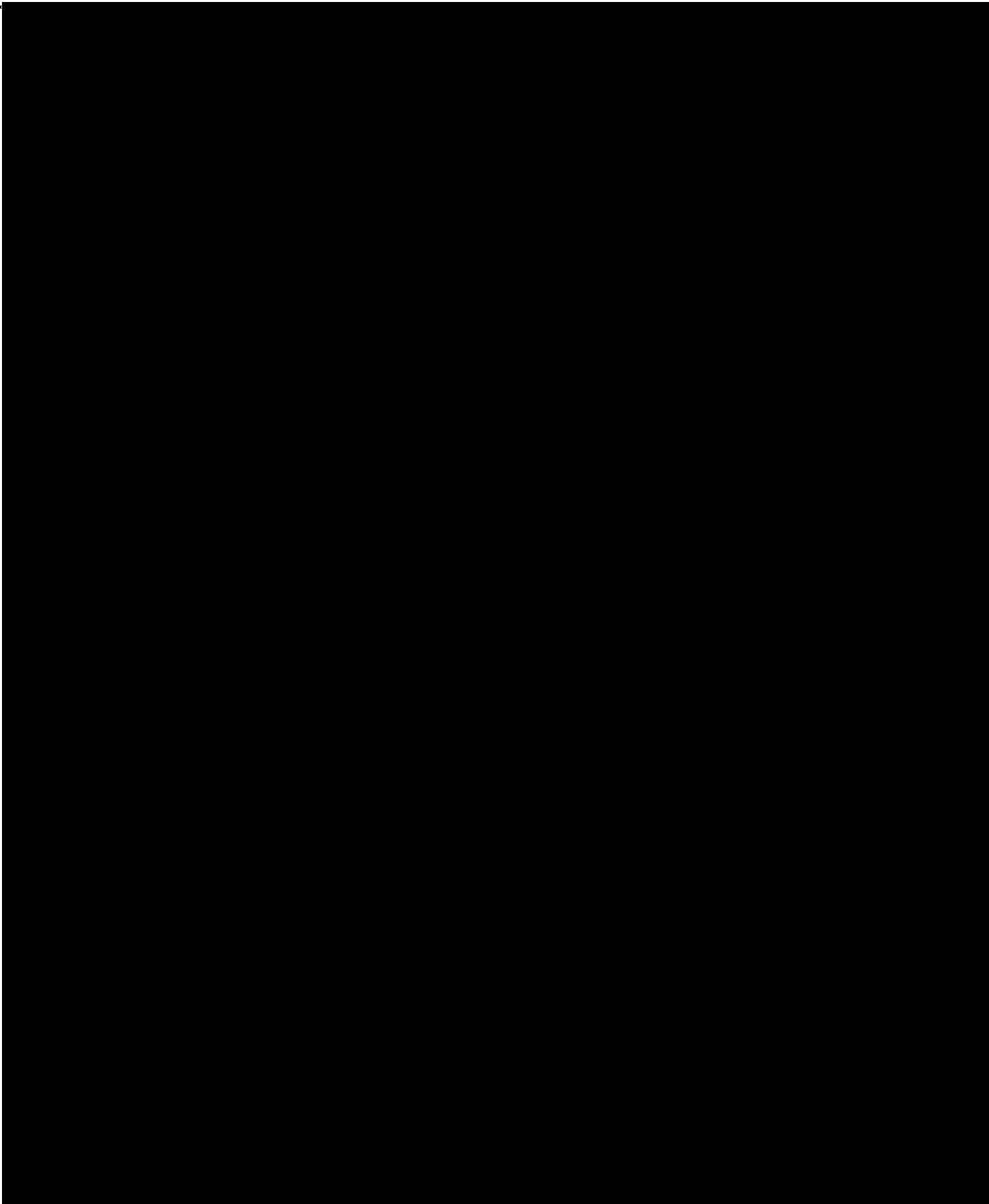


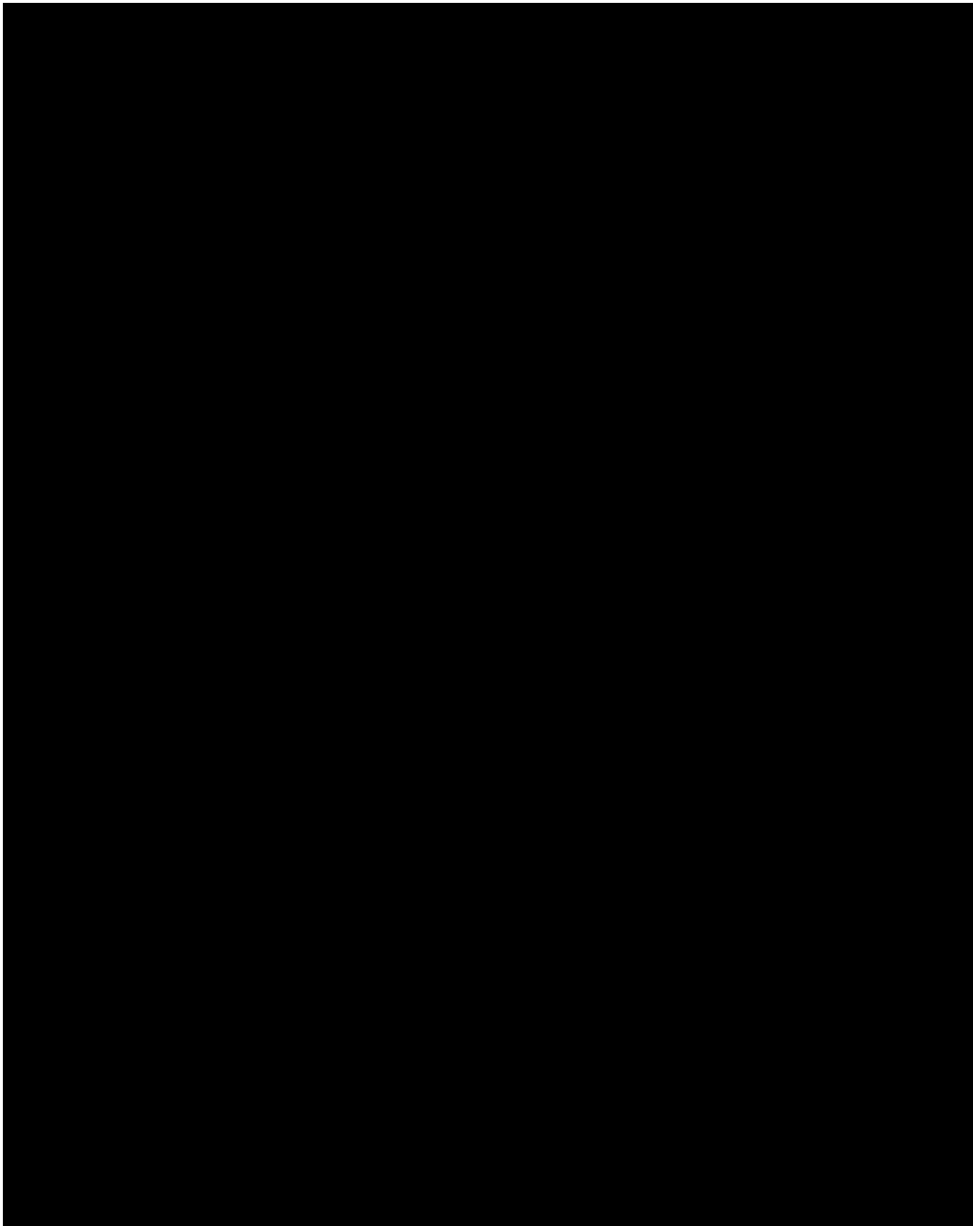


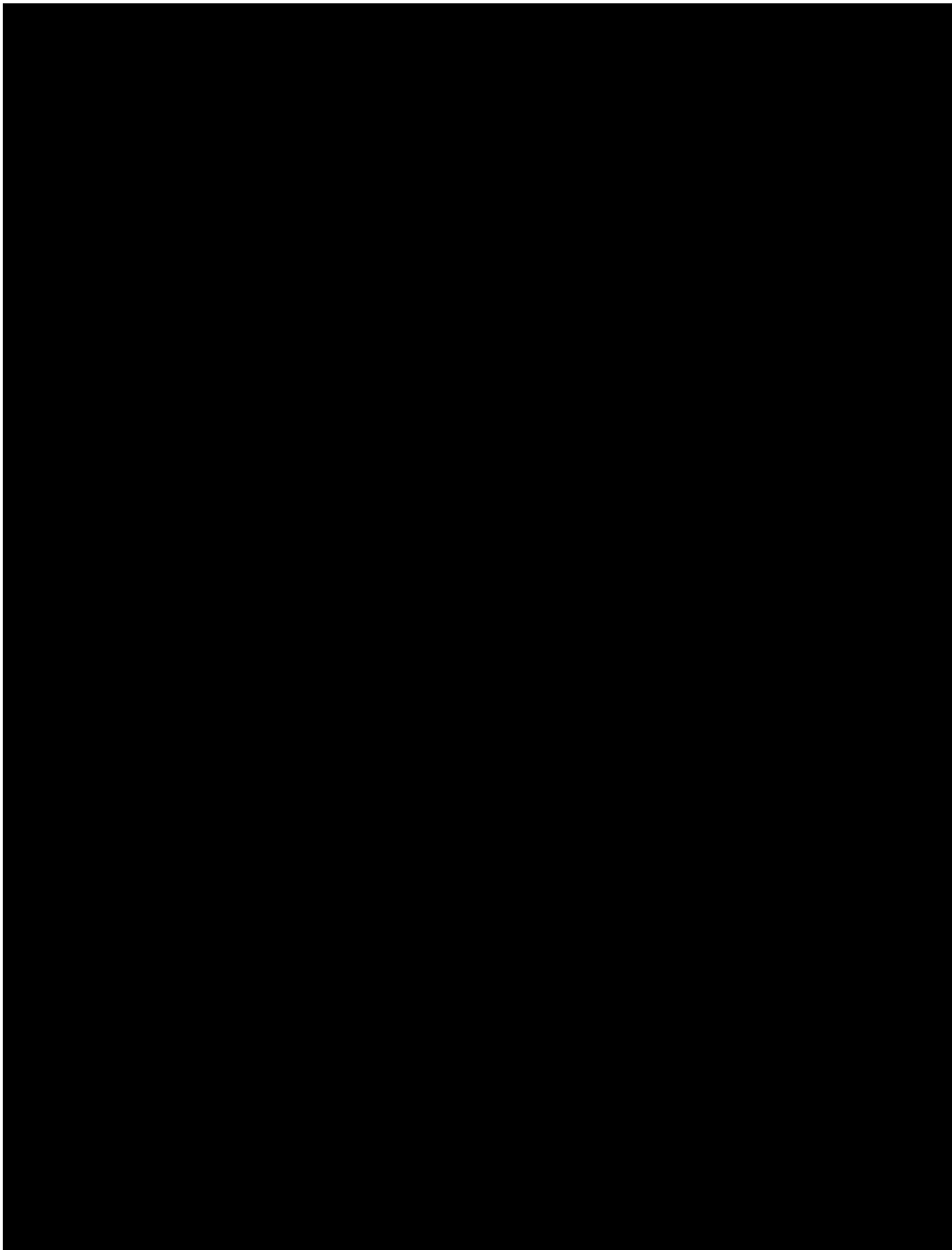


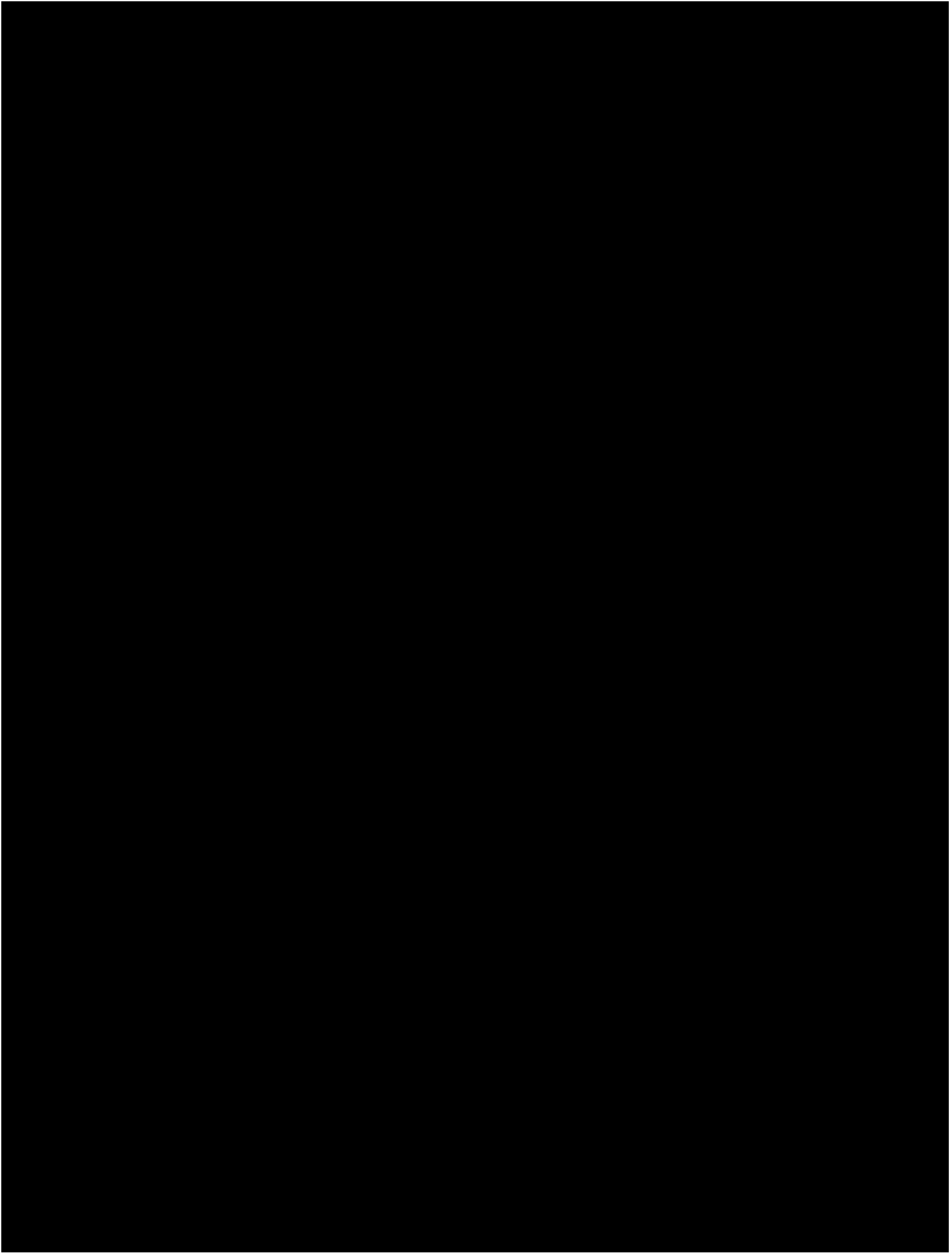
Person-2 that HANA procured equipment in the United States on behalf of the

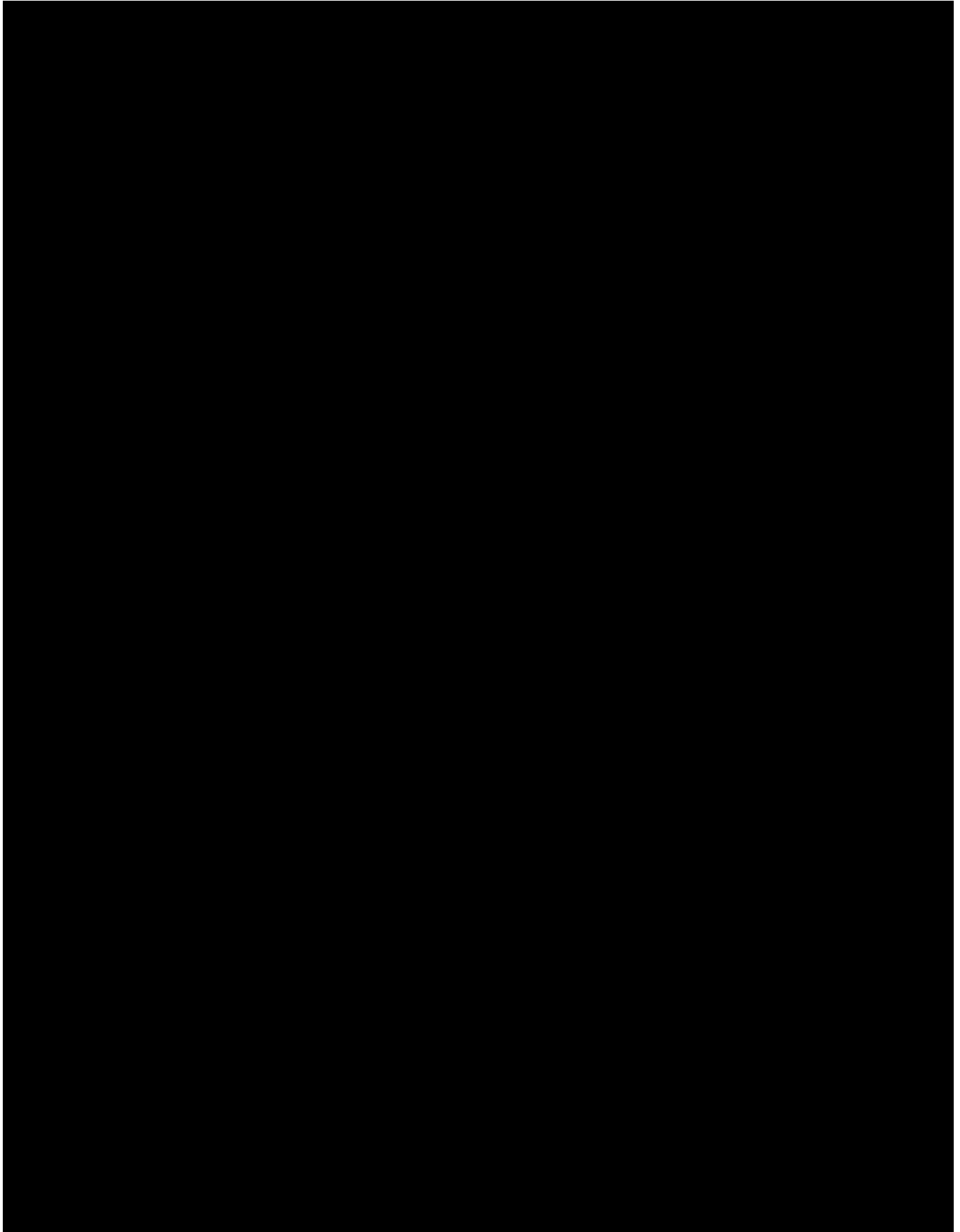


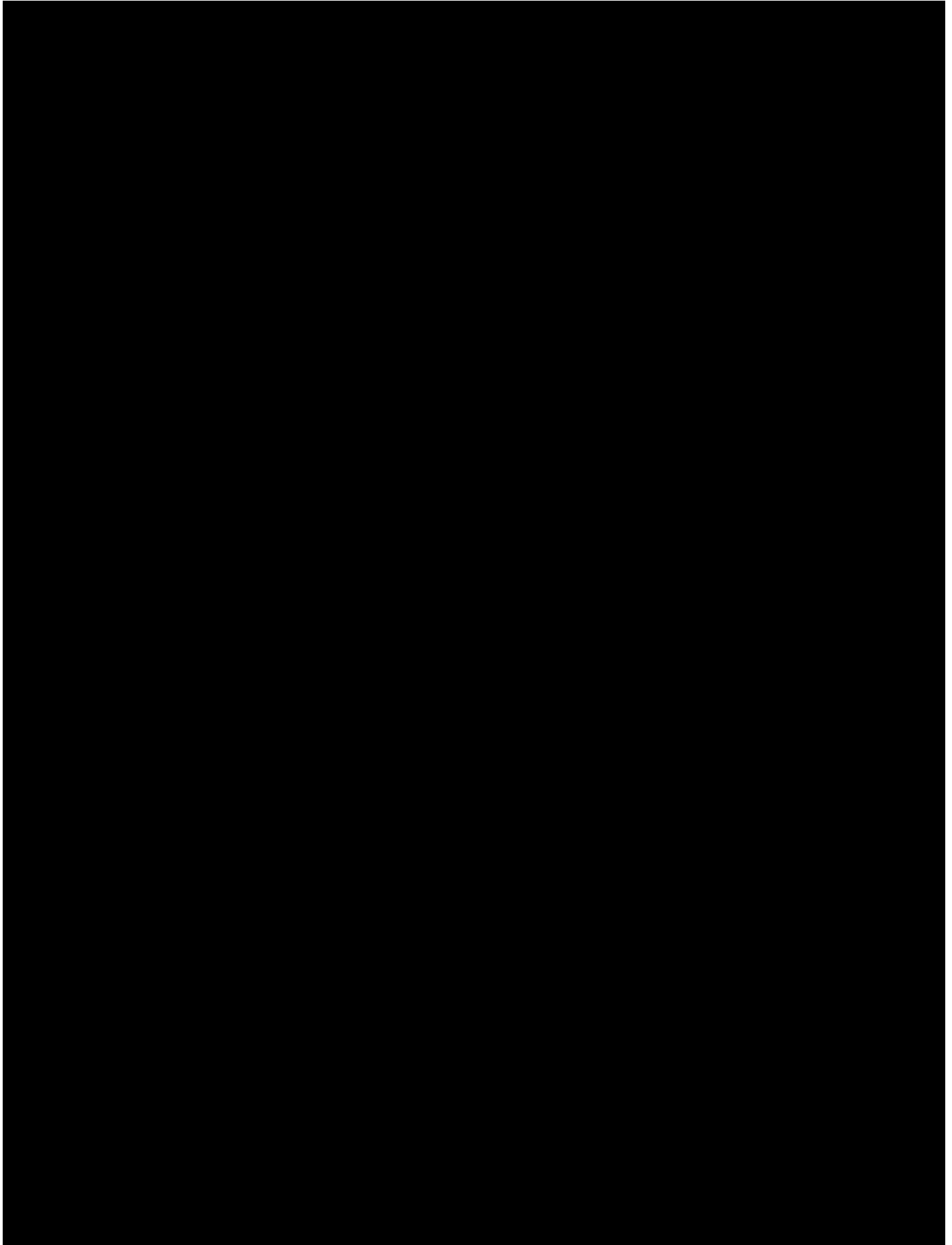


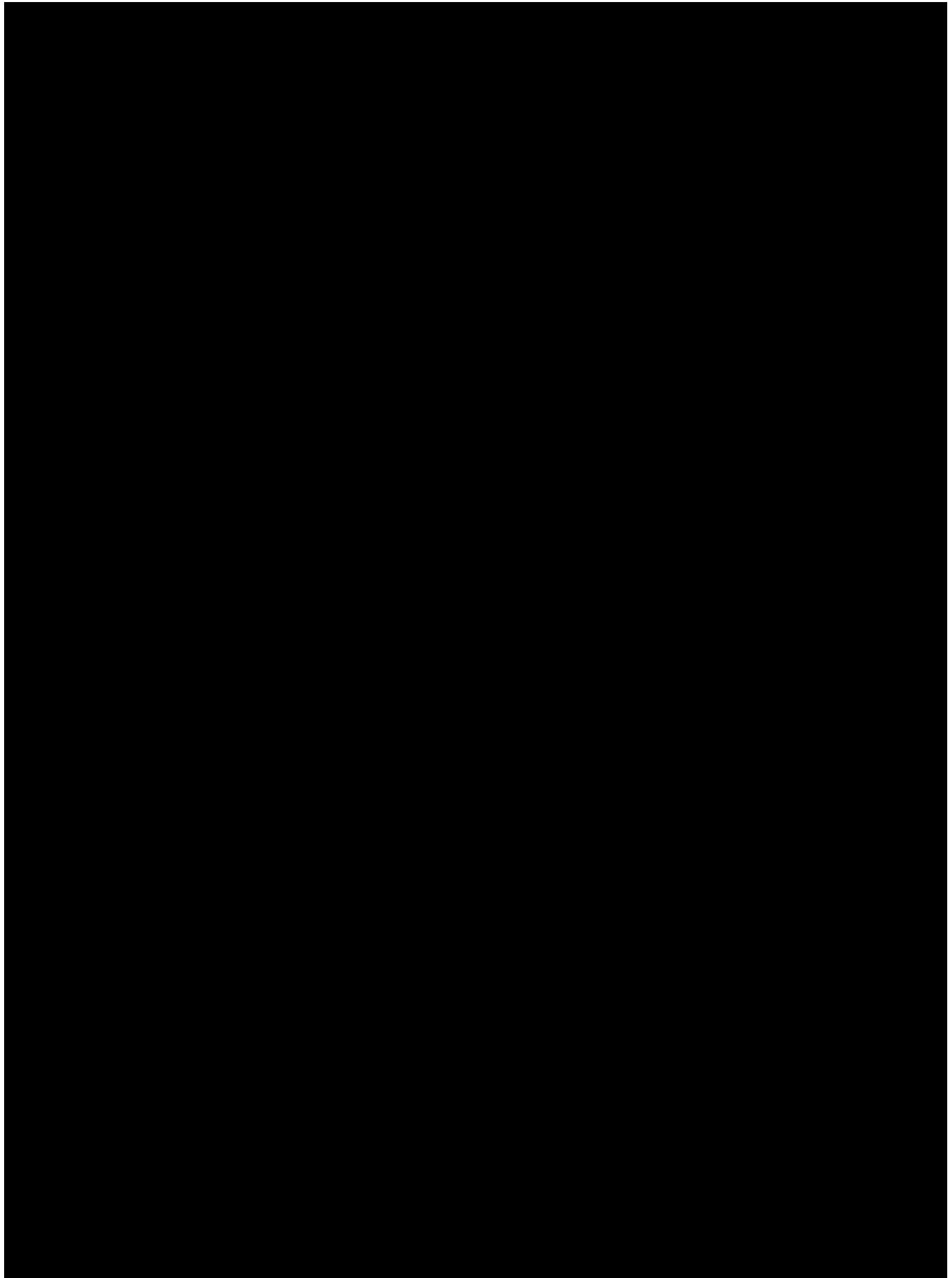


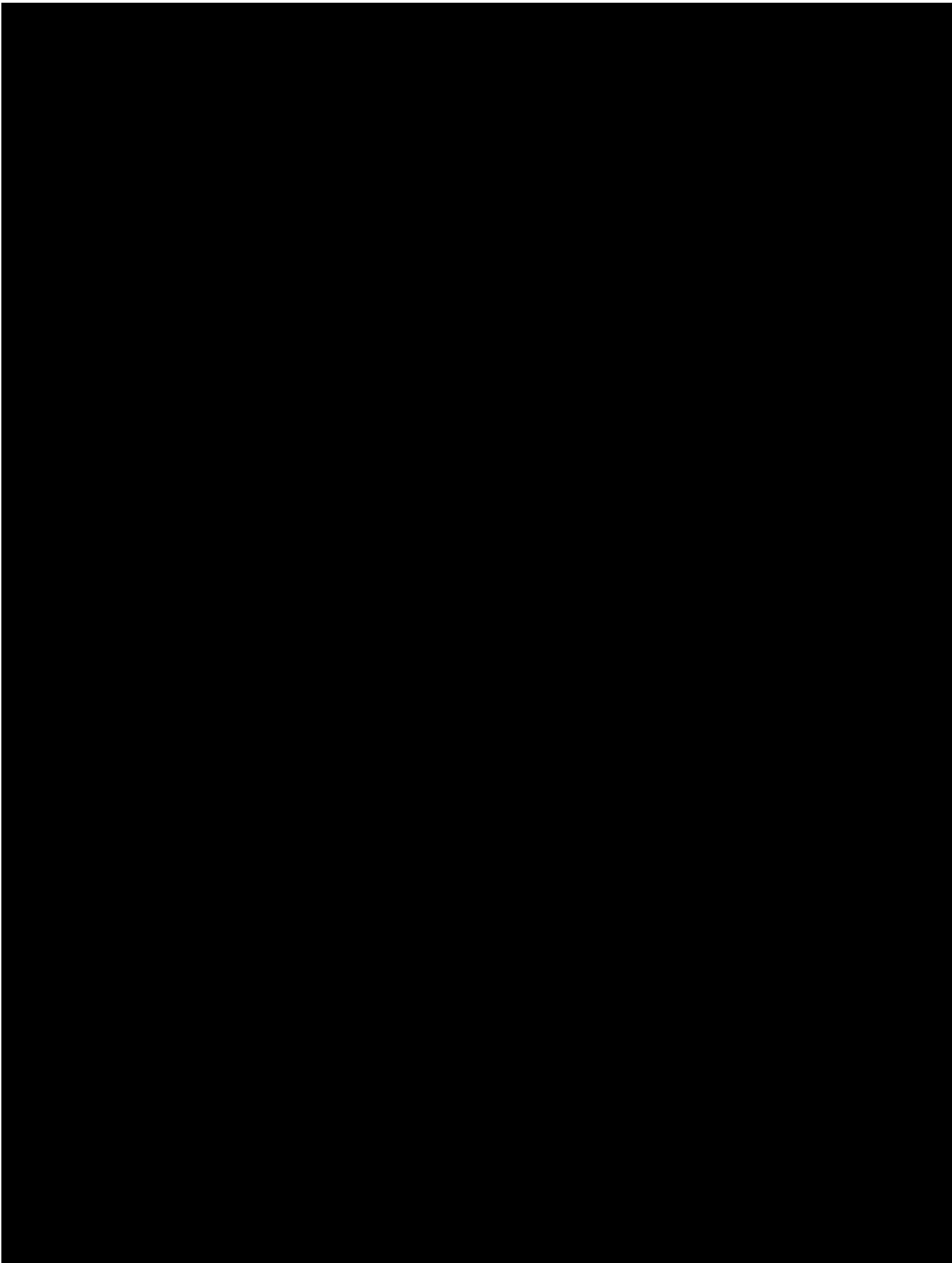


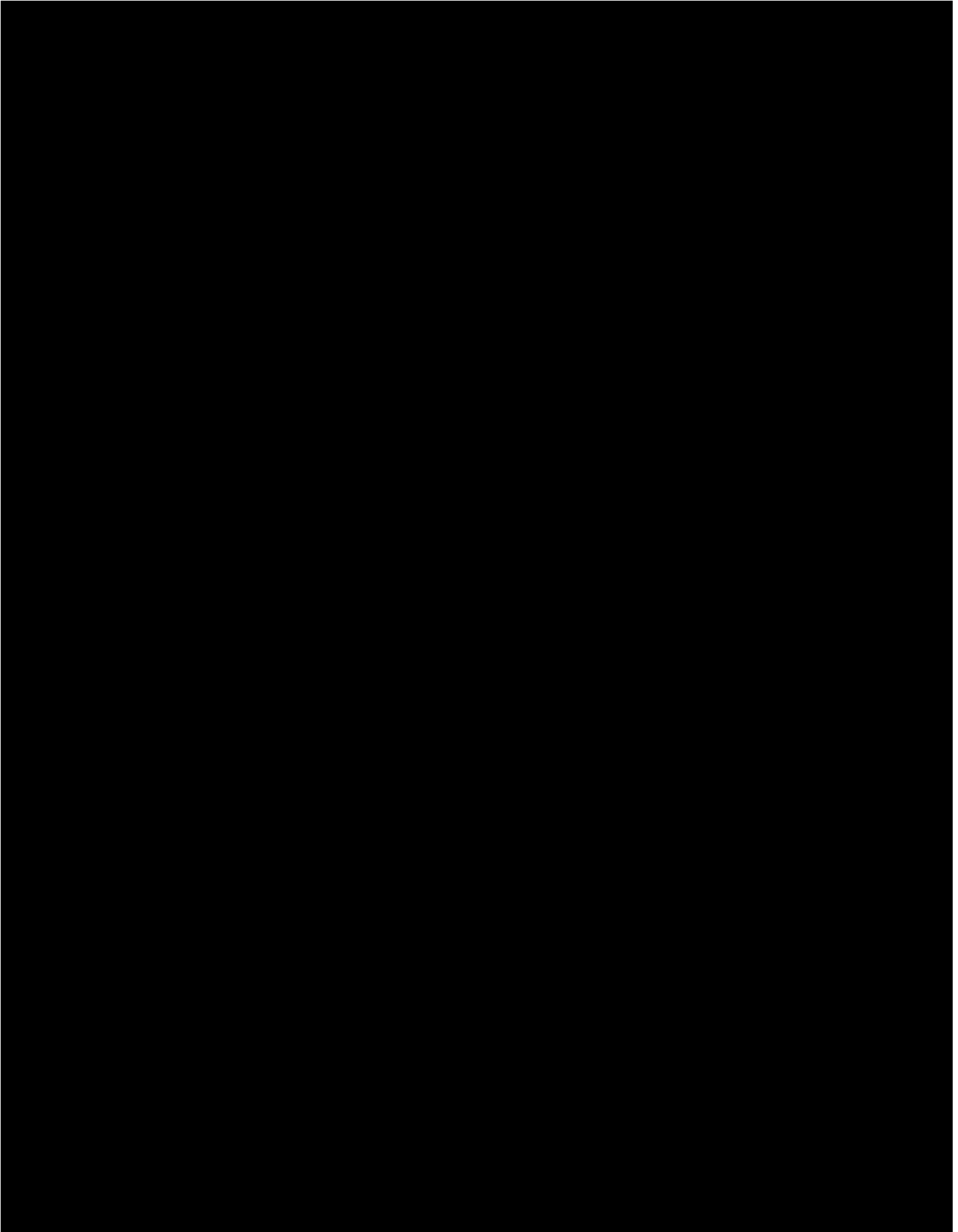


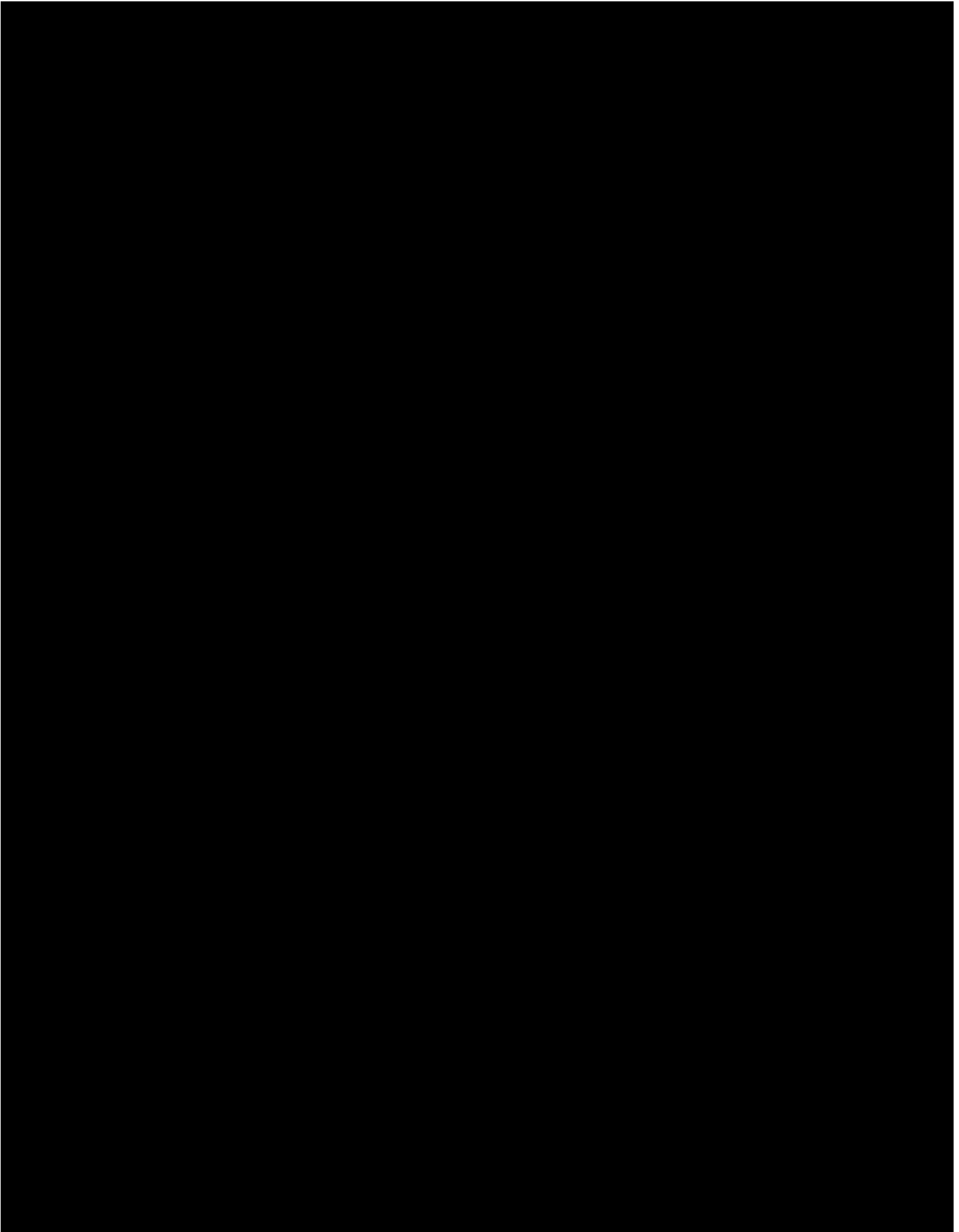


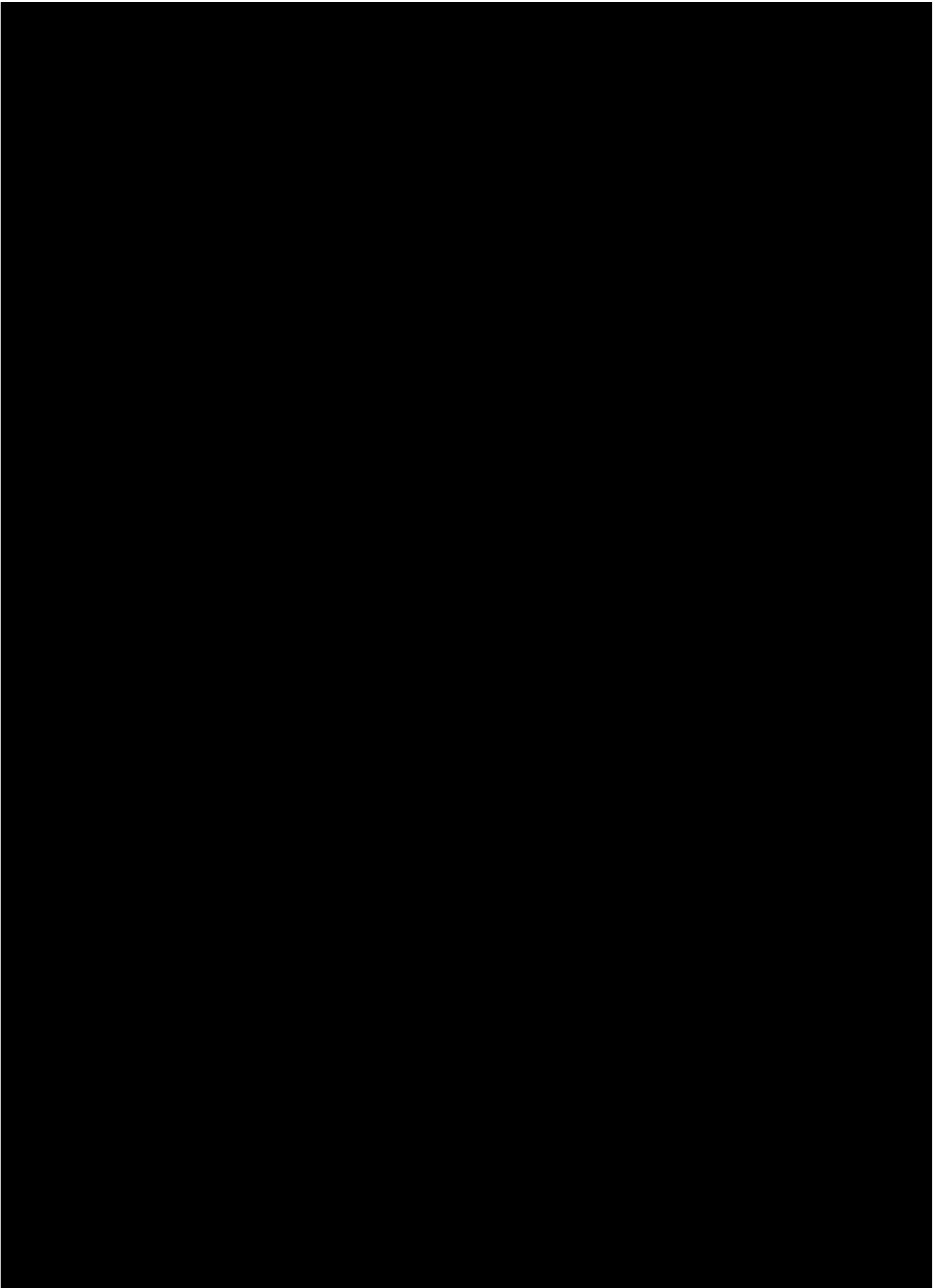


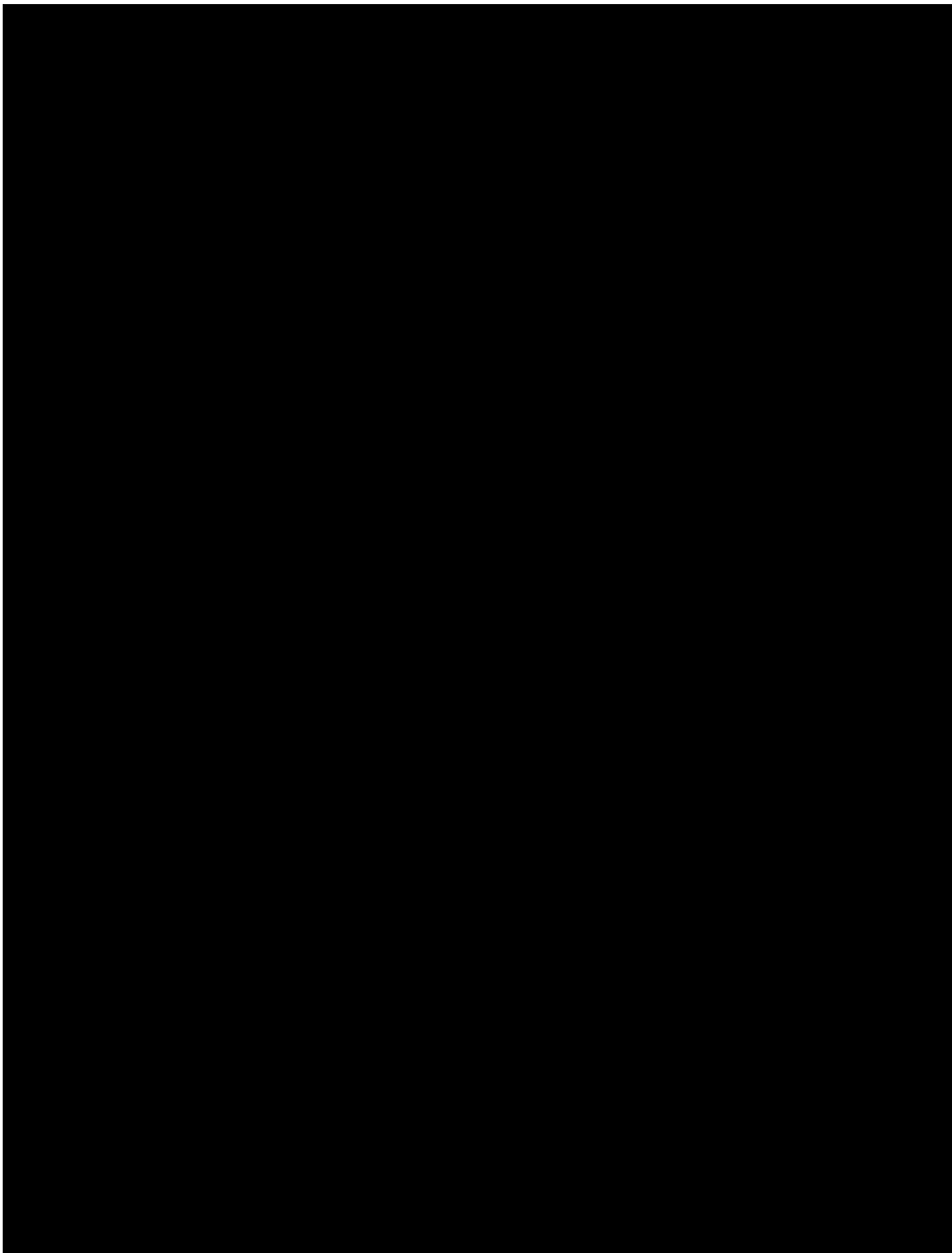


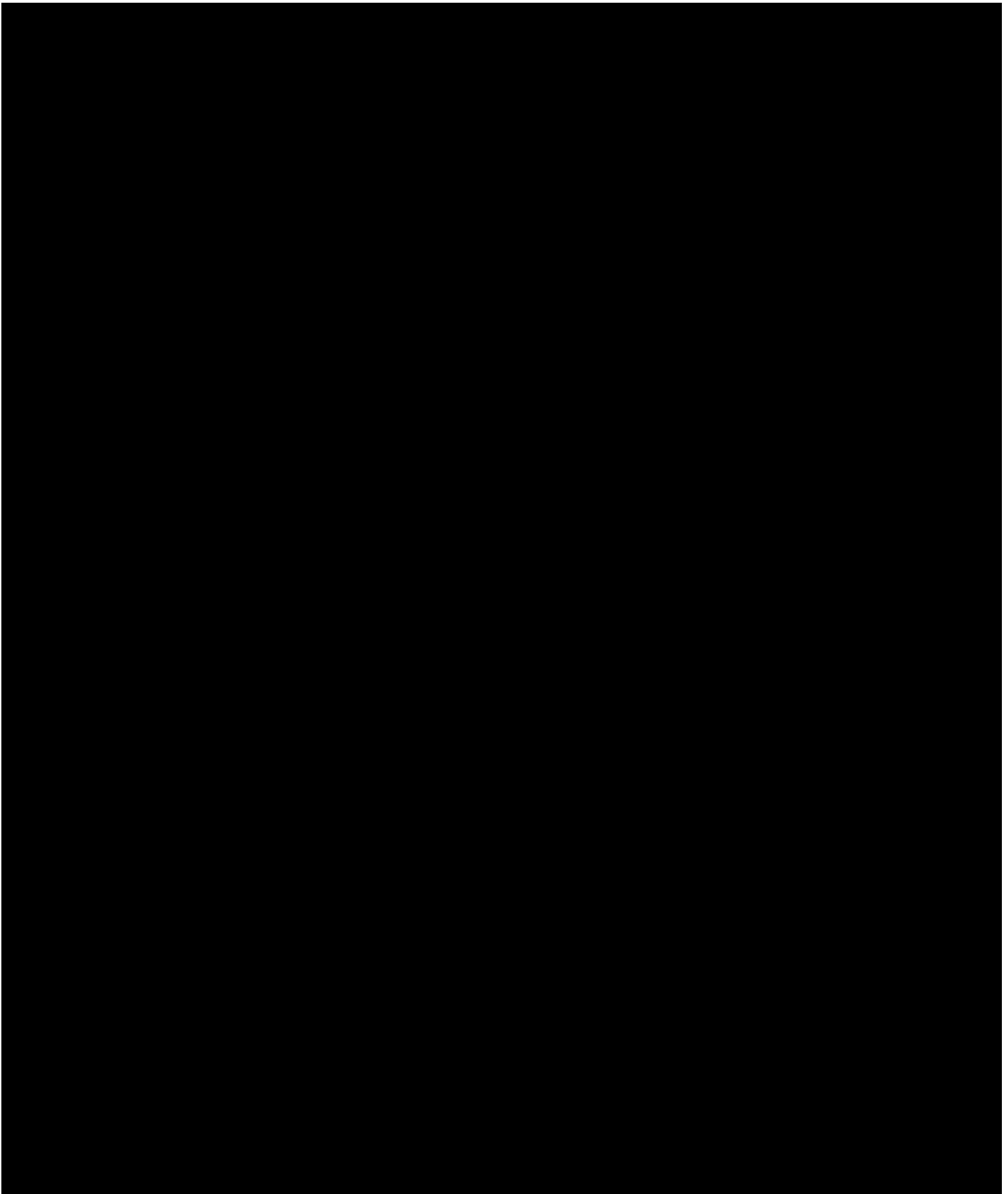


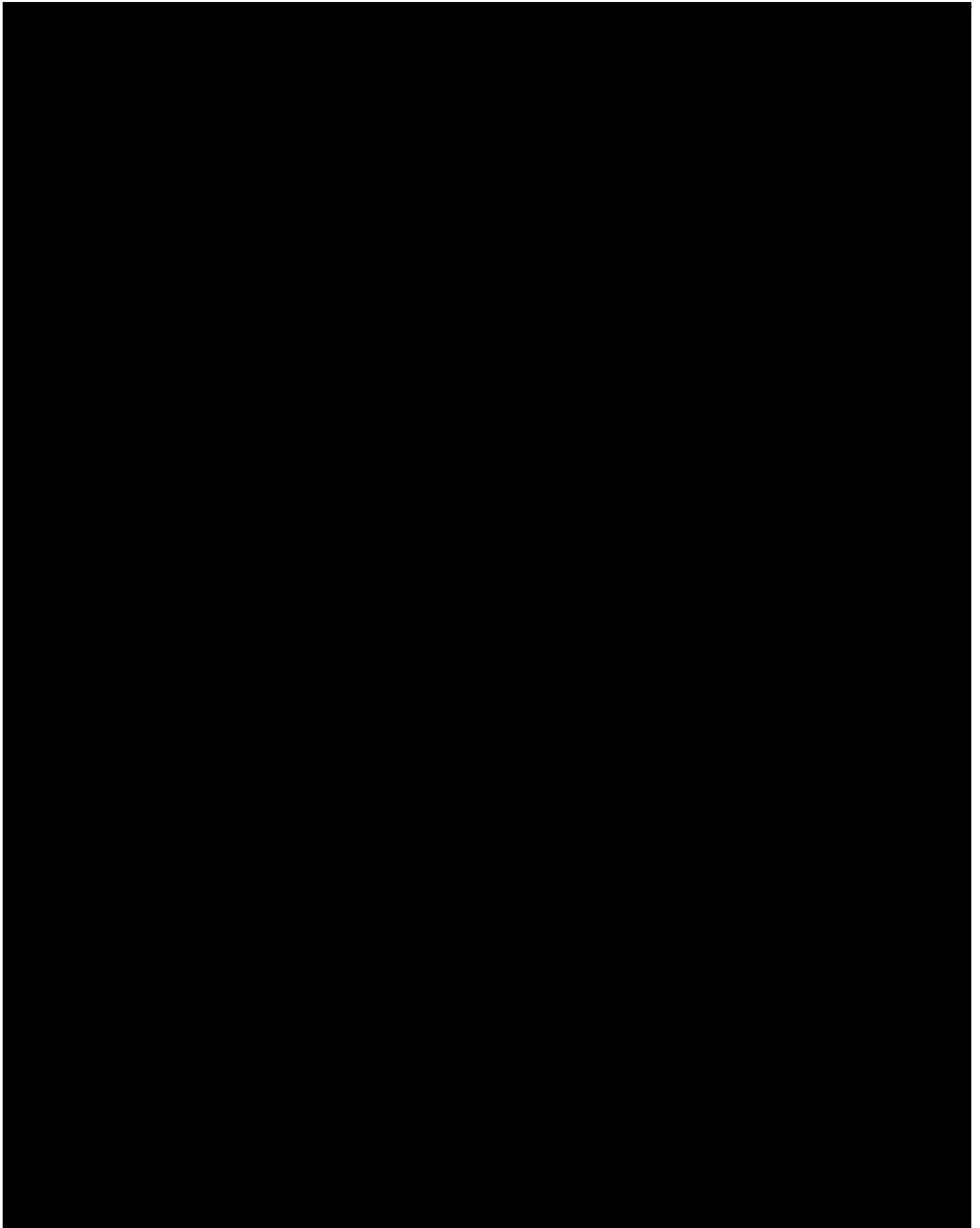


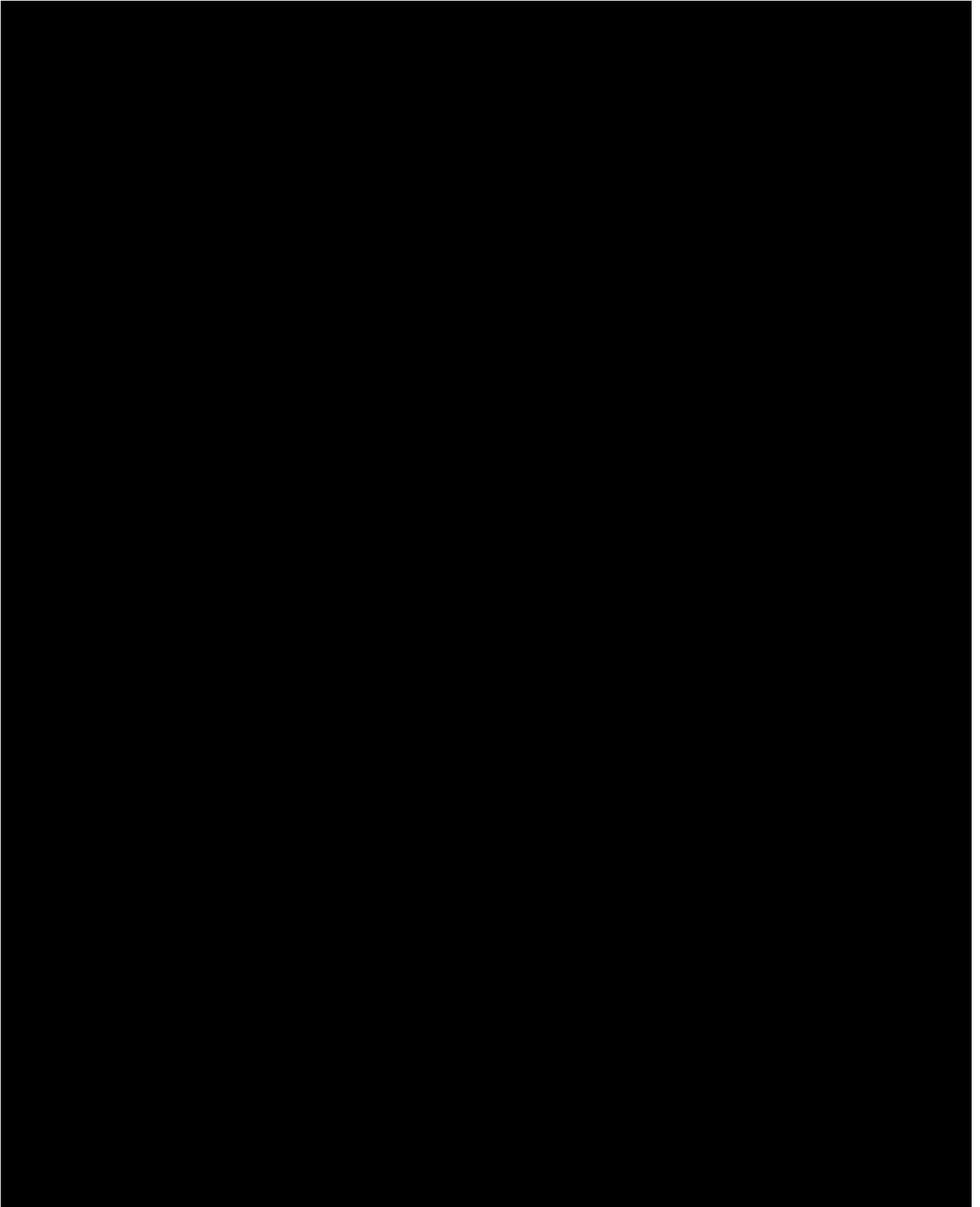




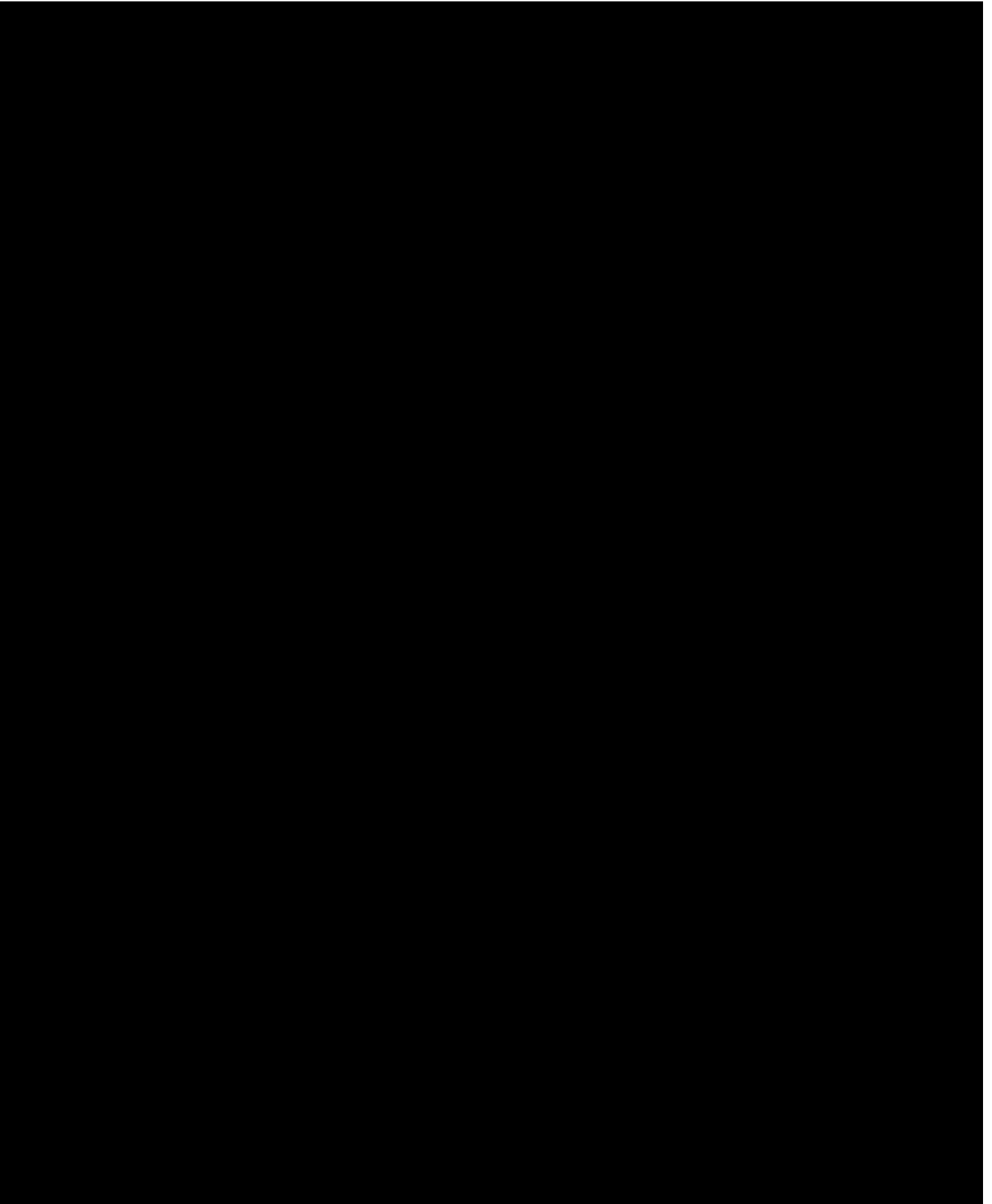


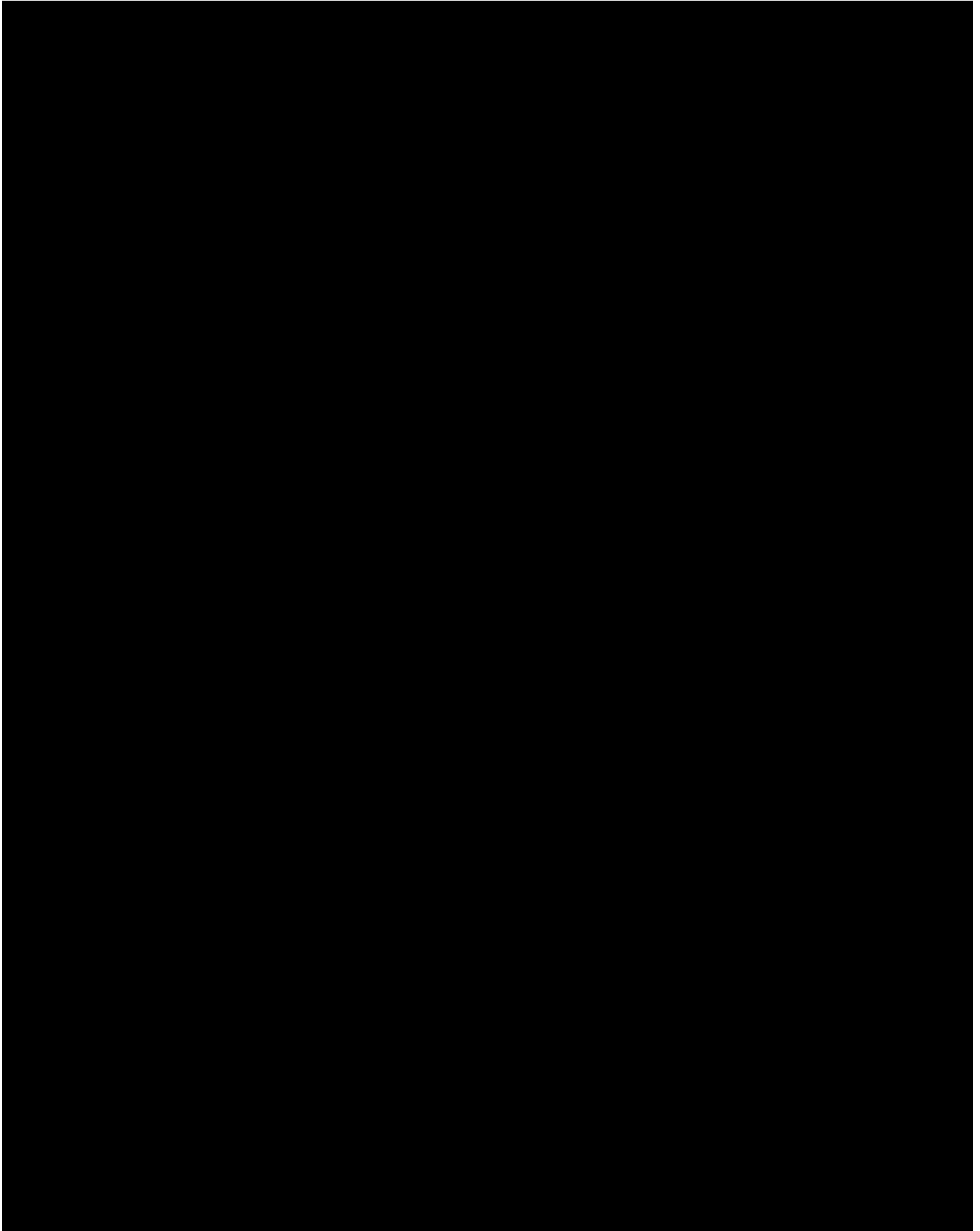


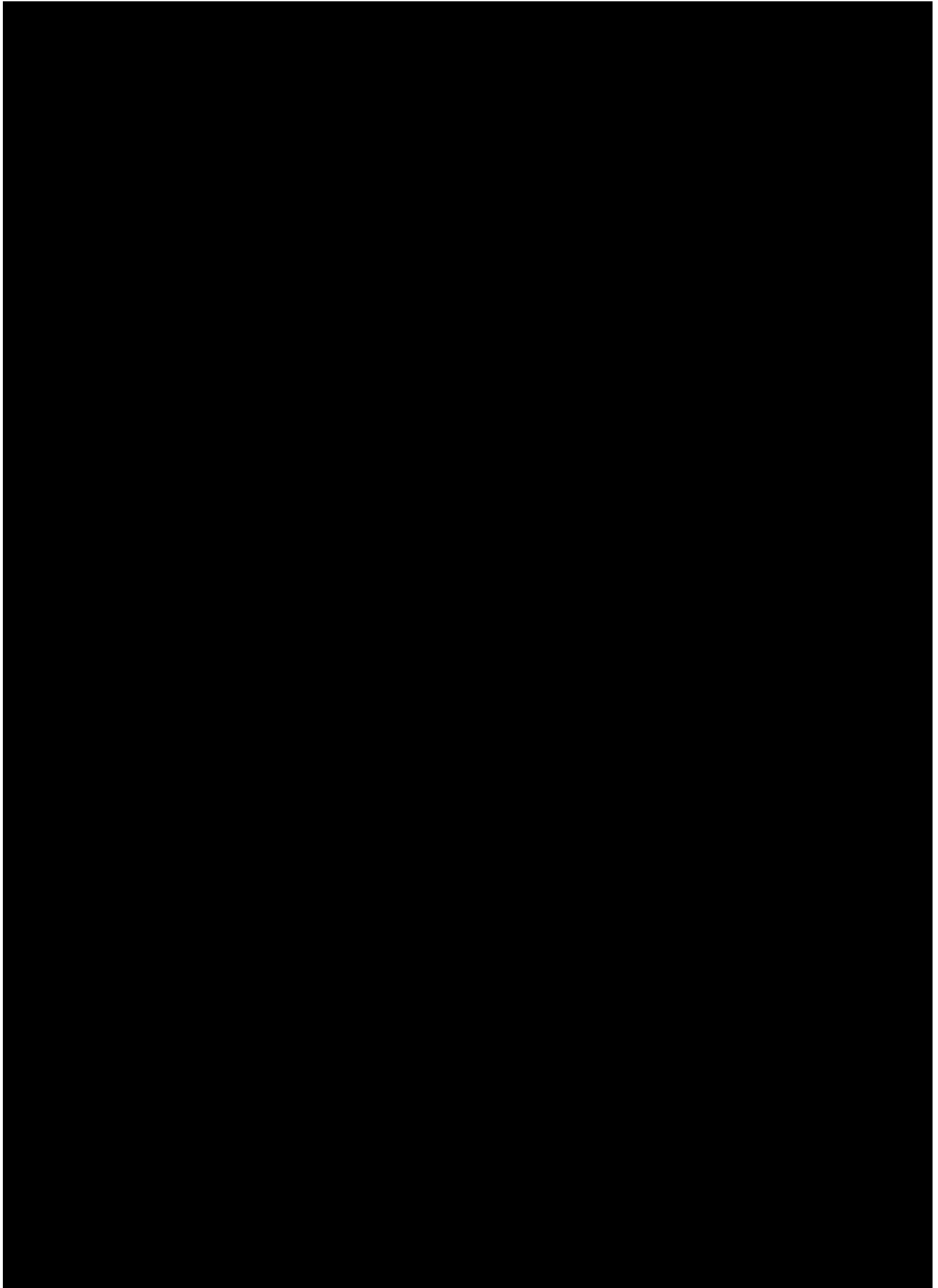


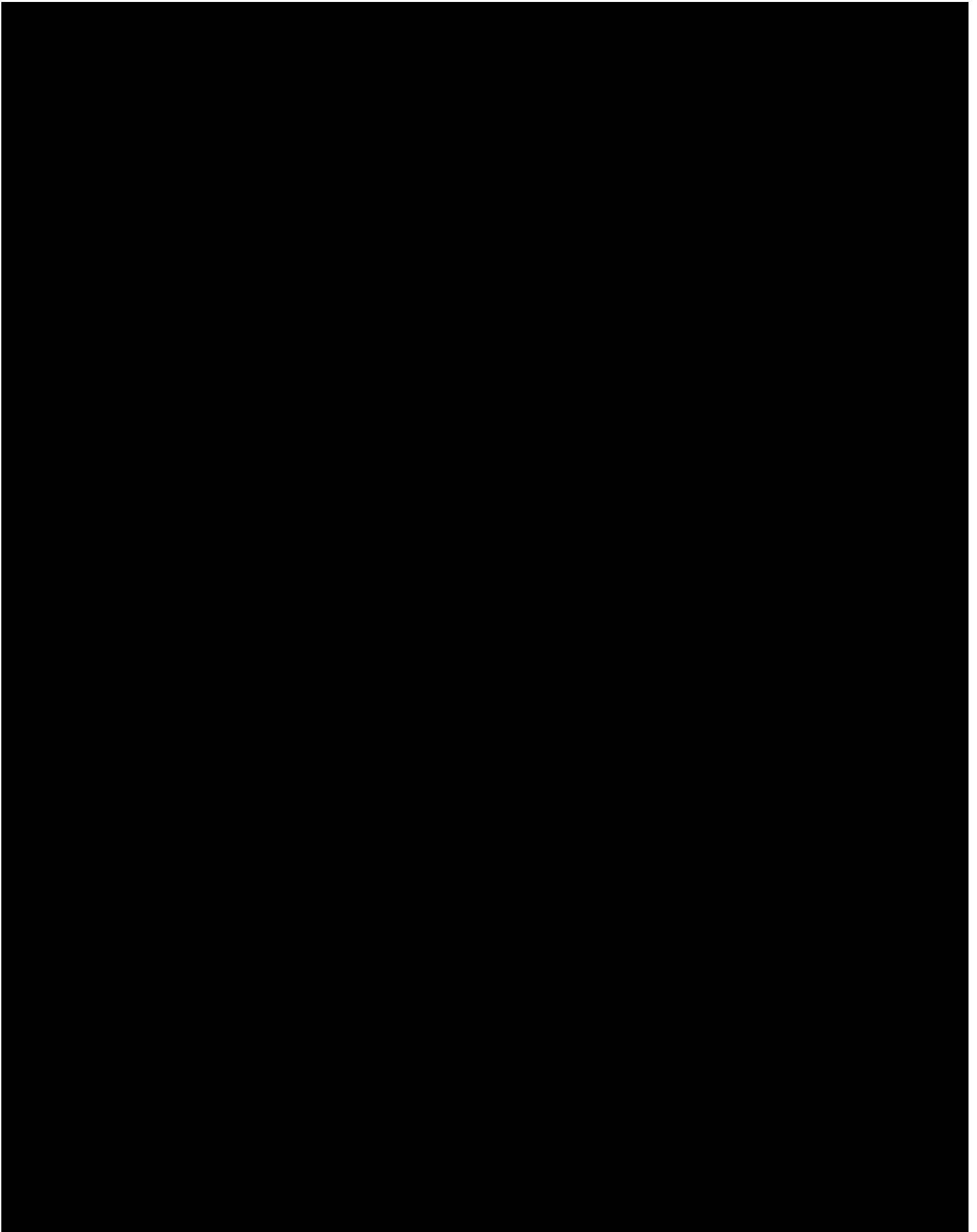


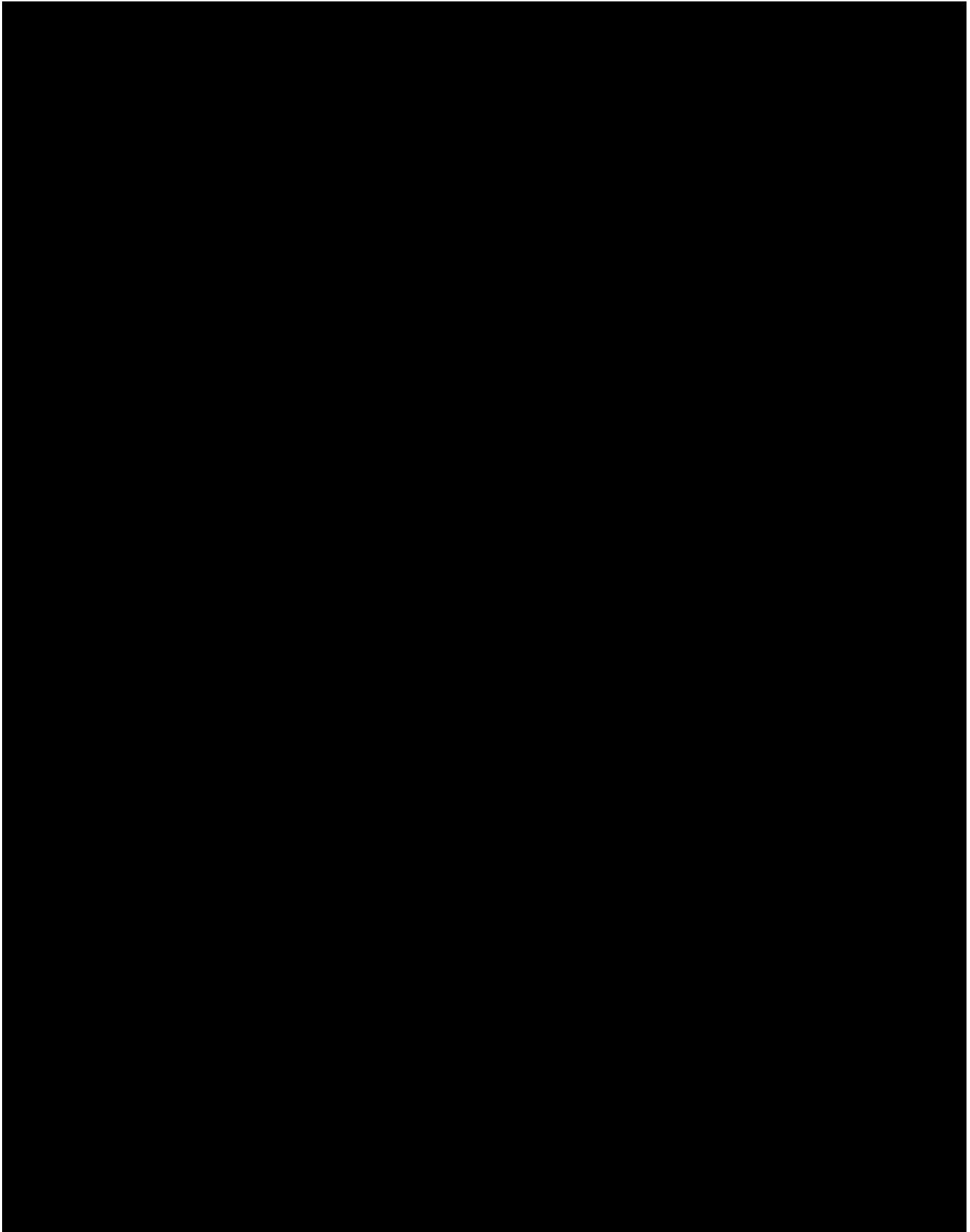


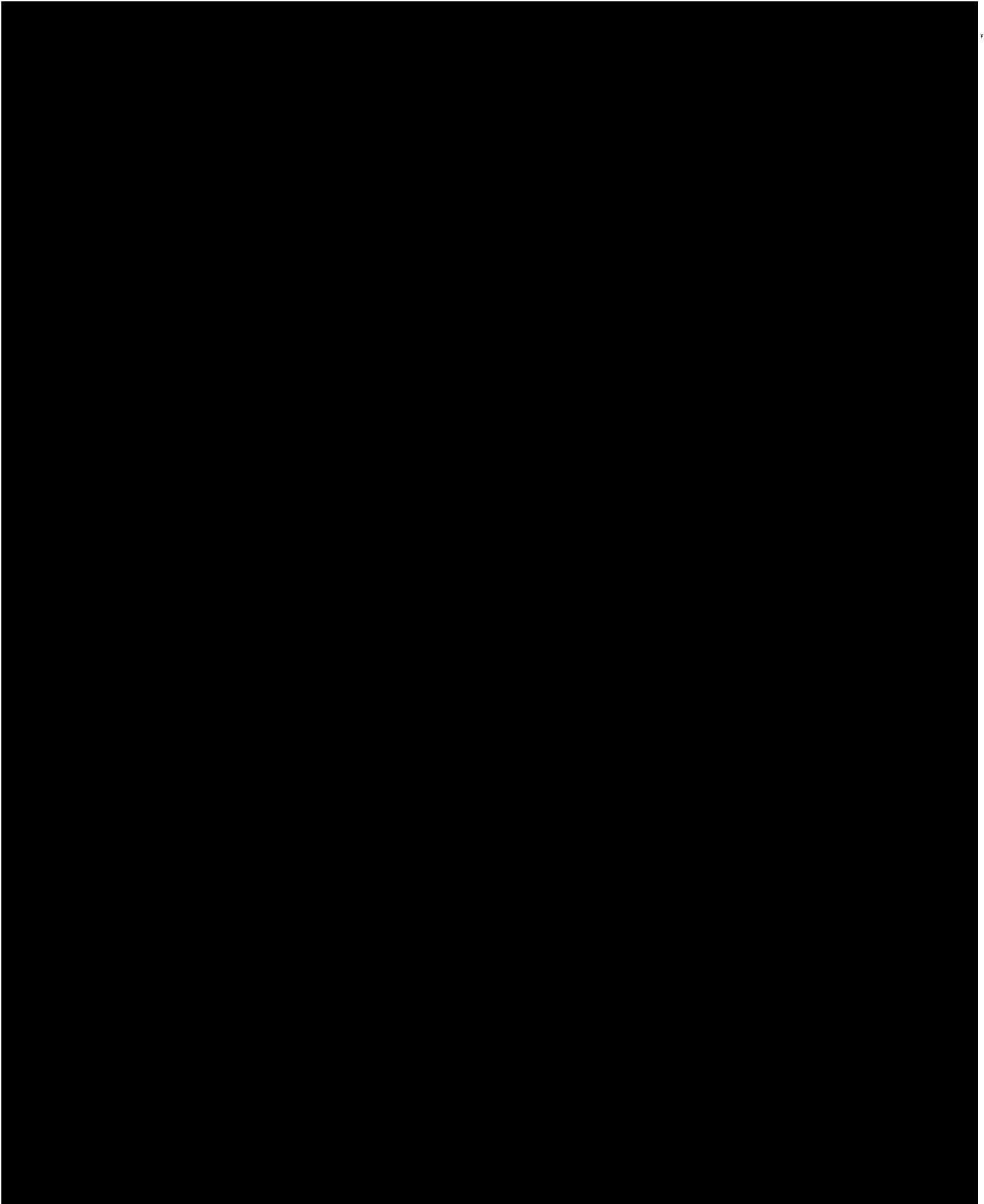


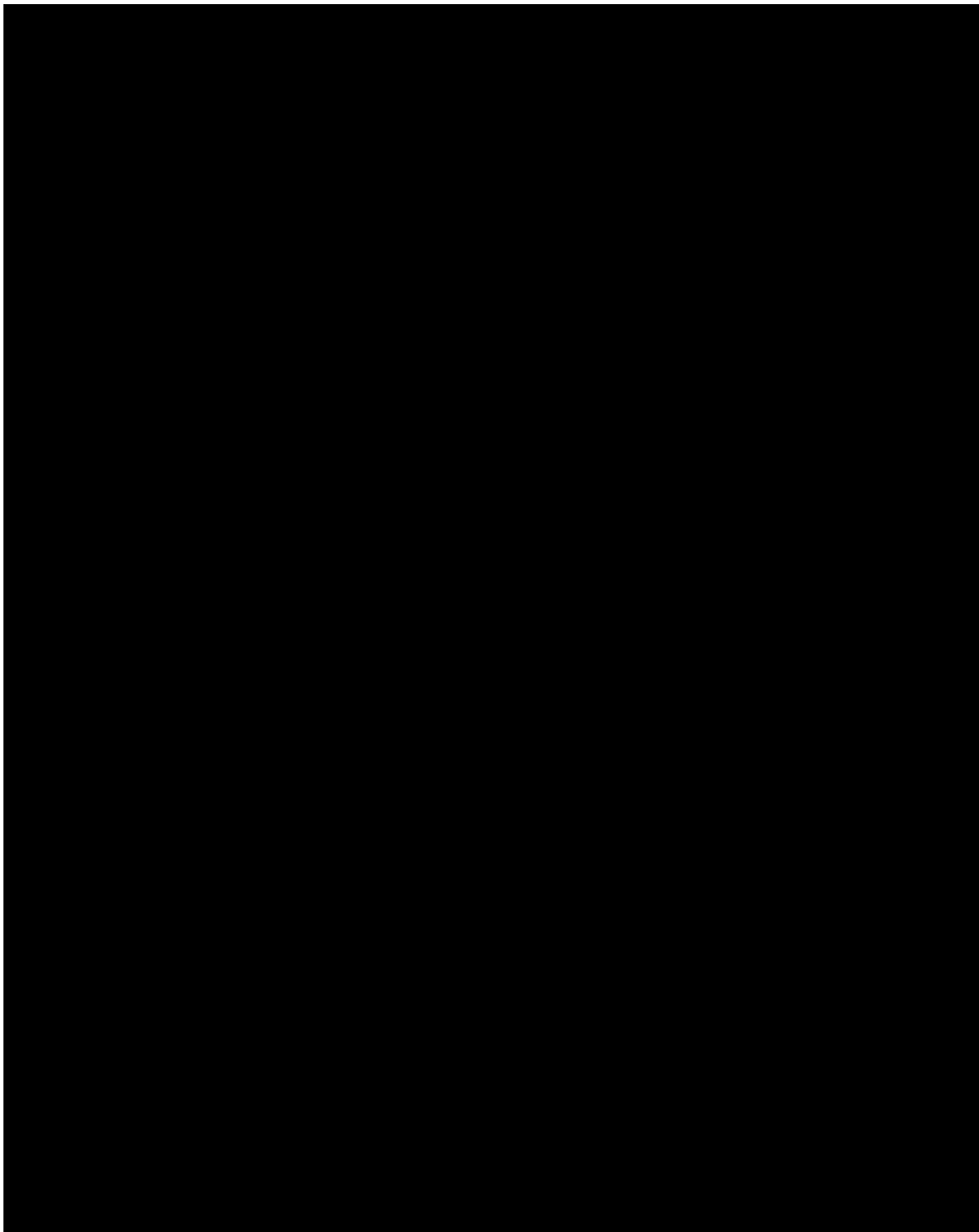


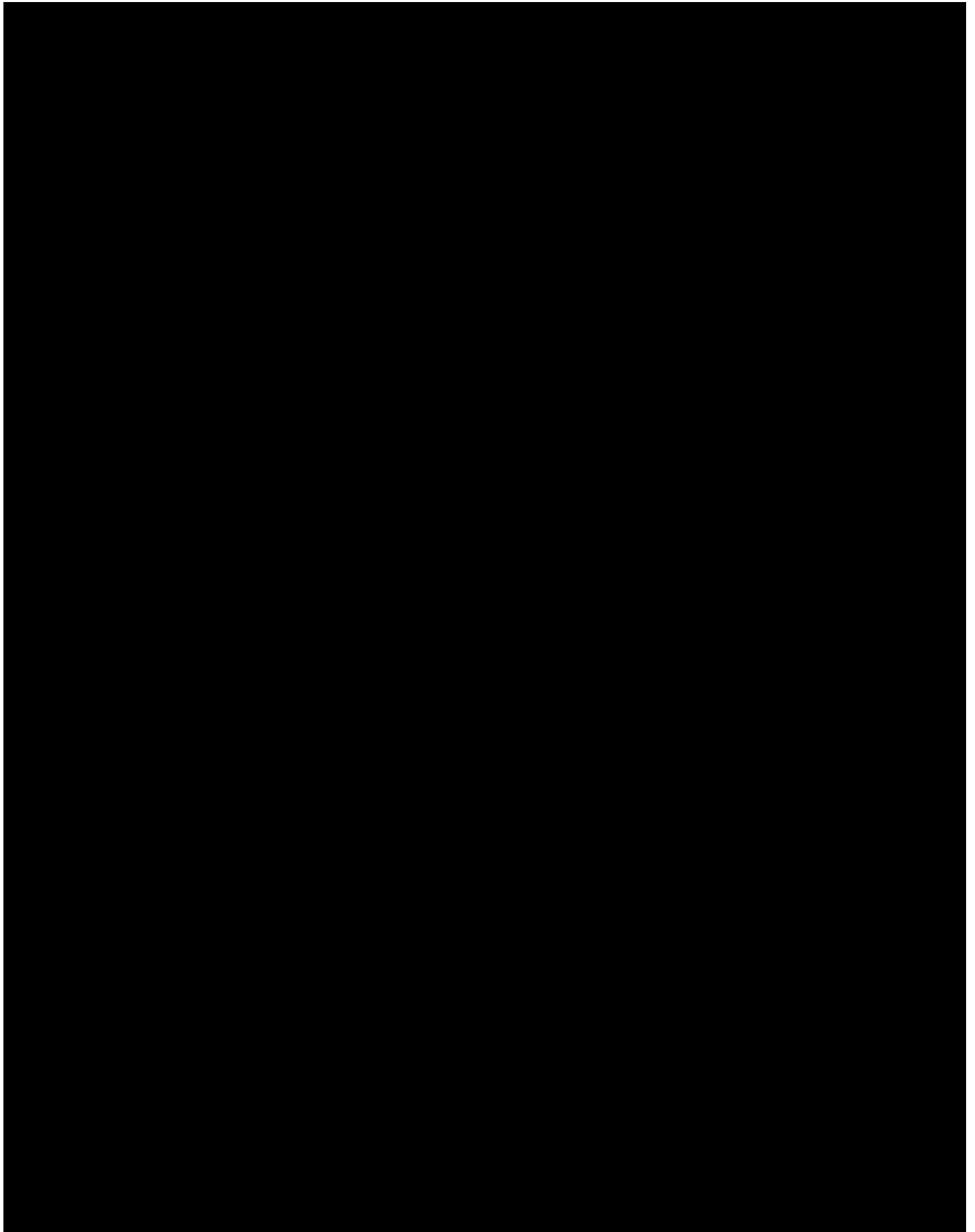


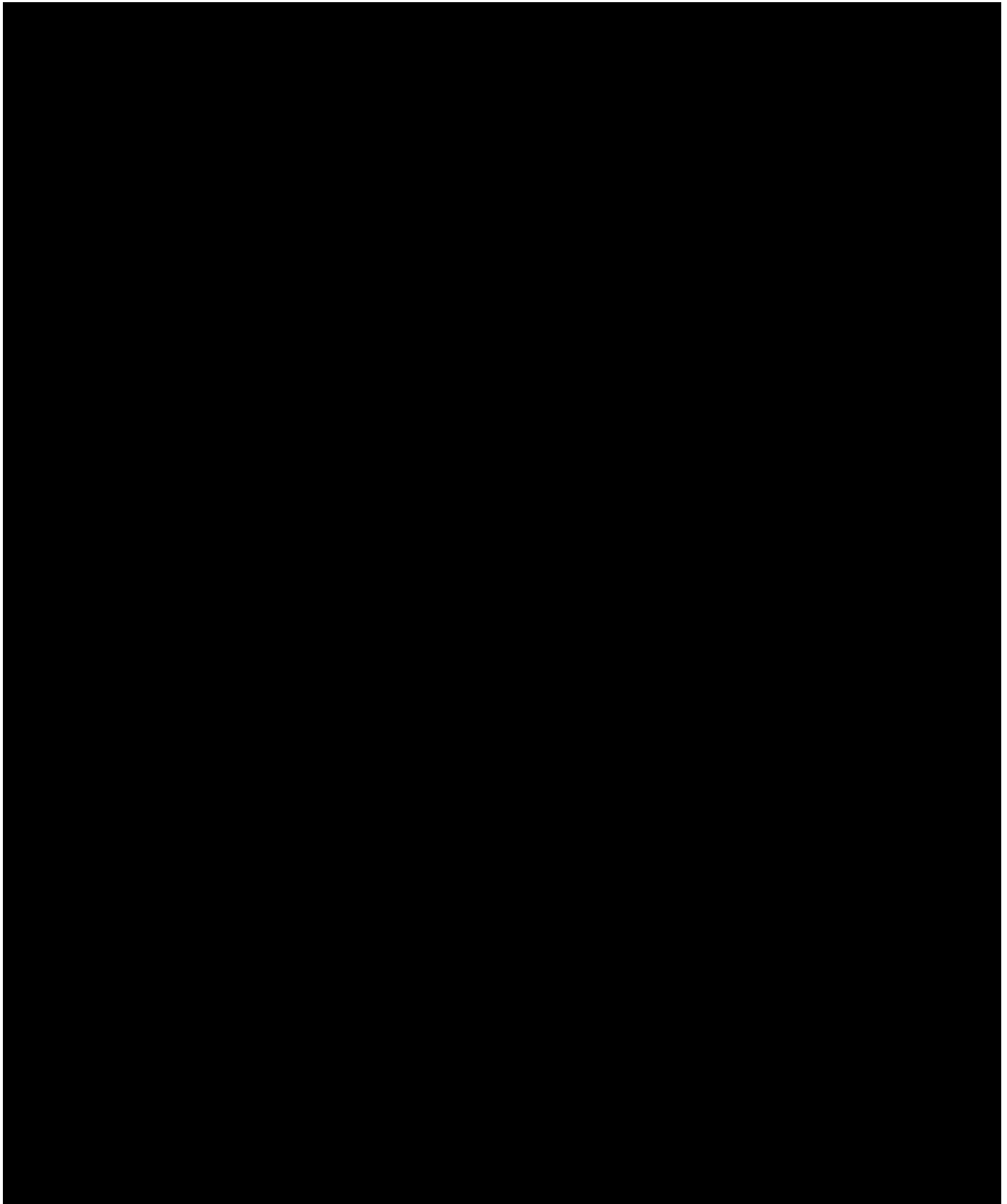


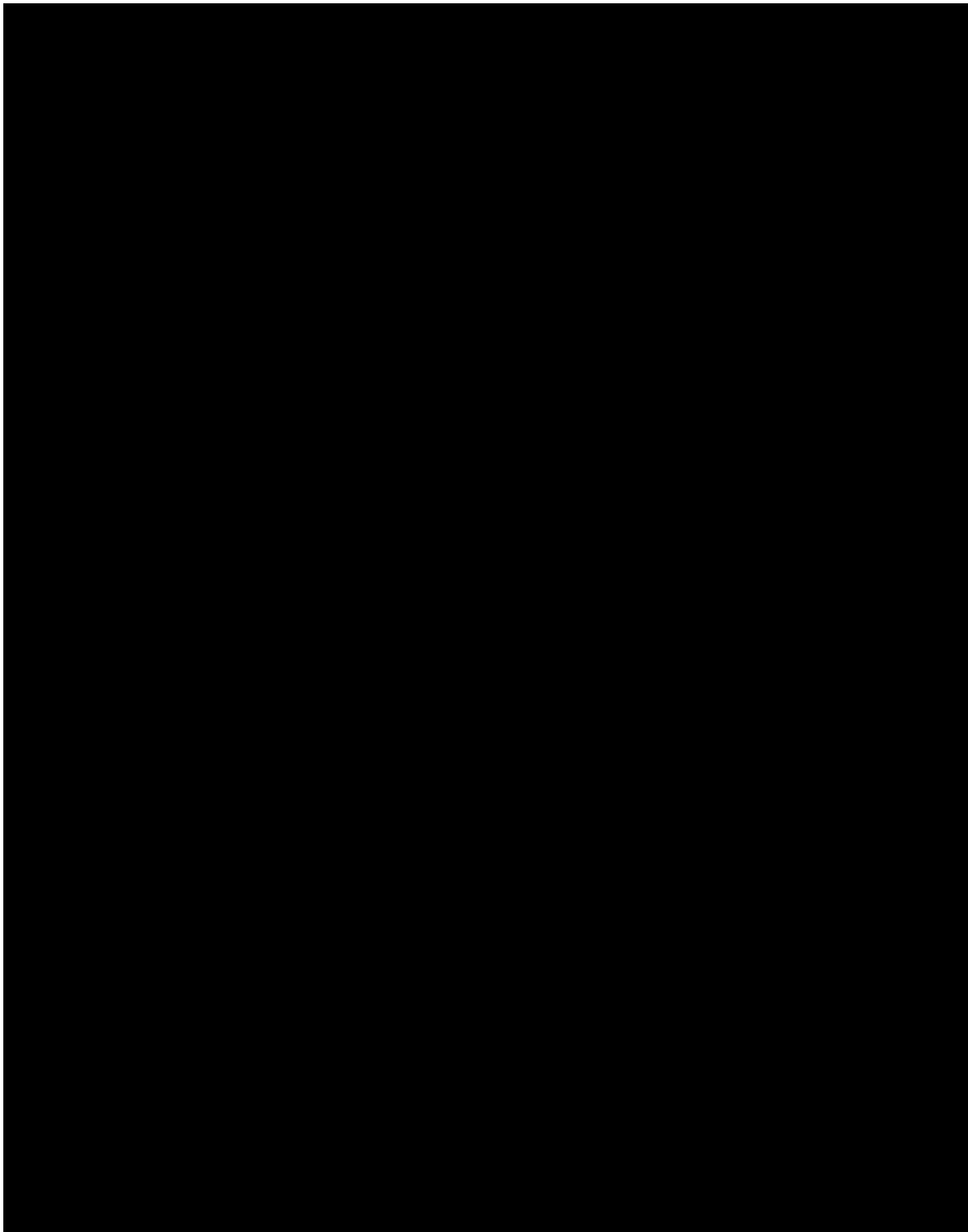


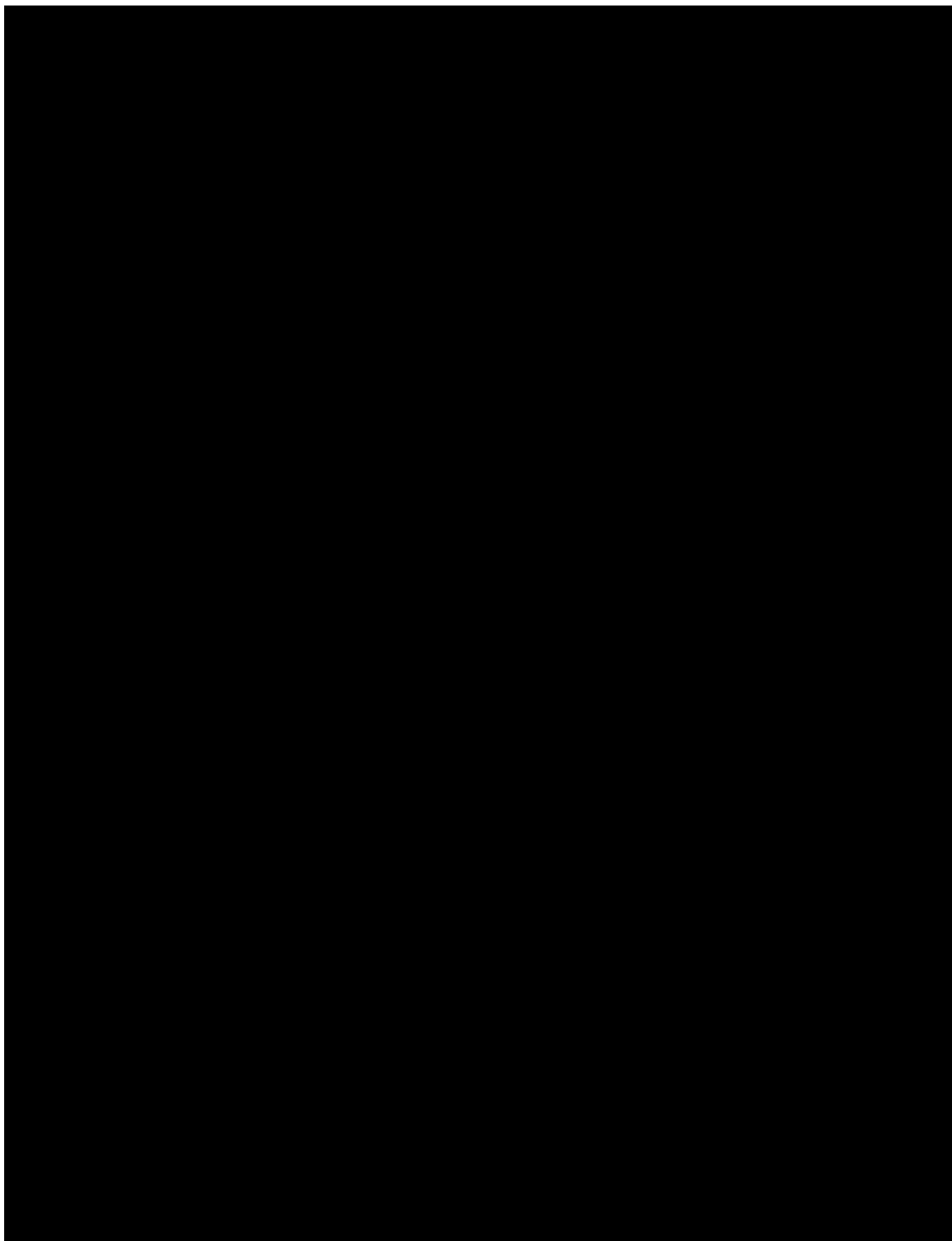


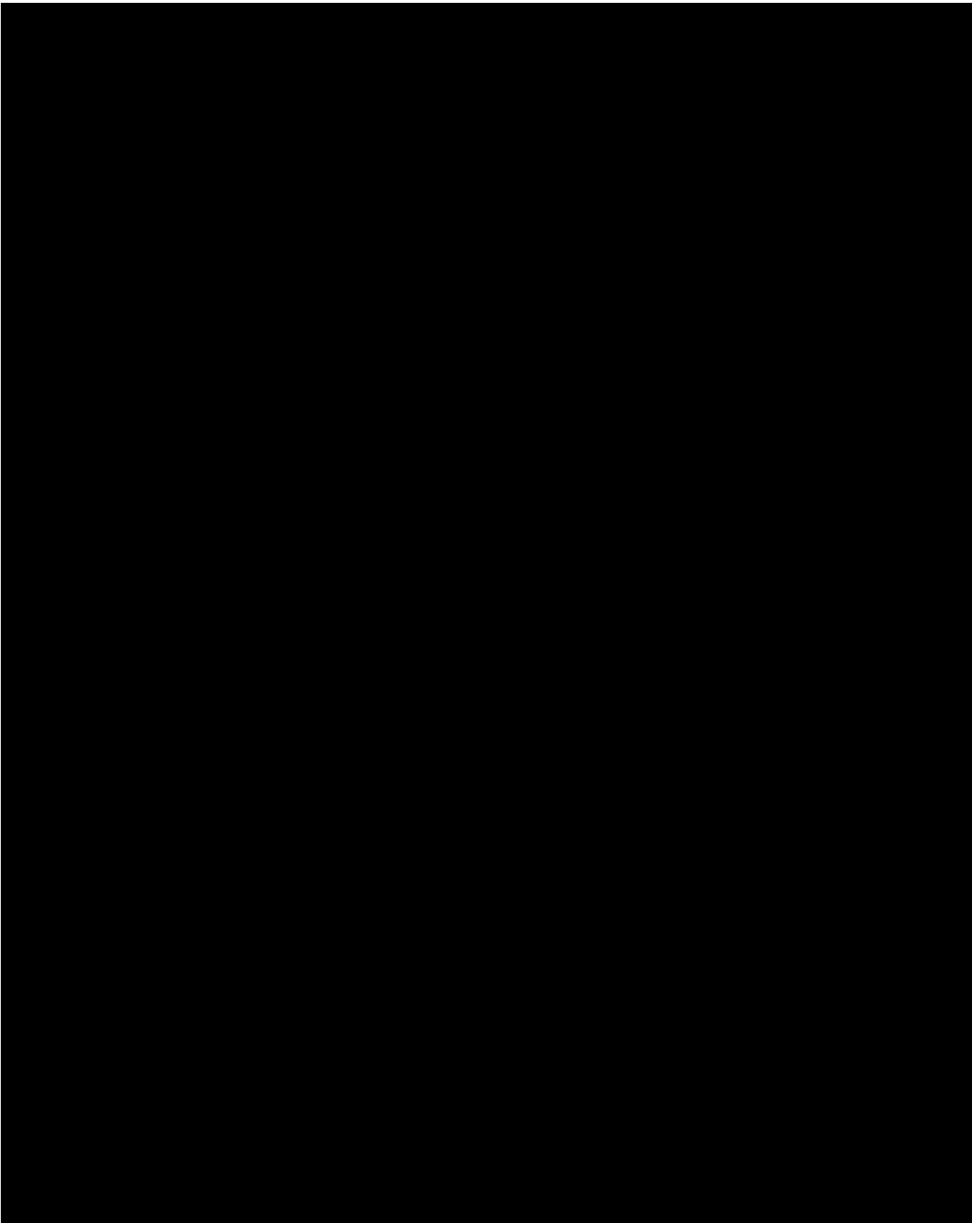


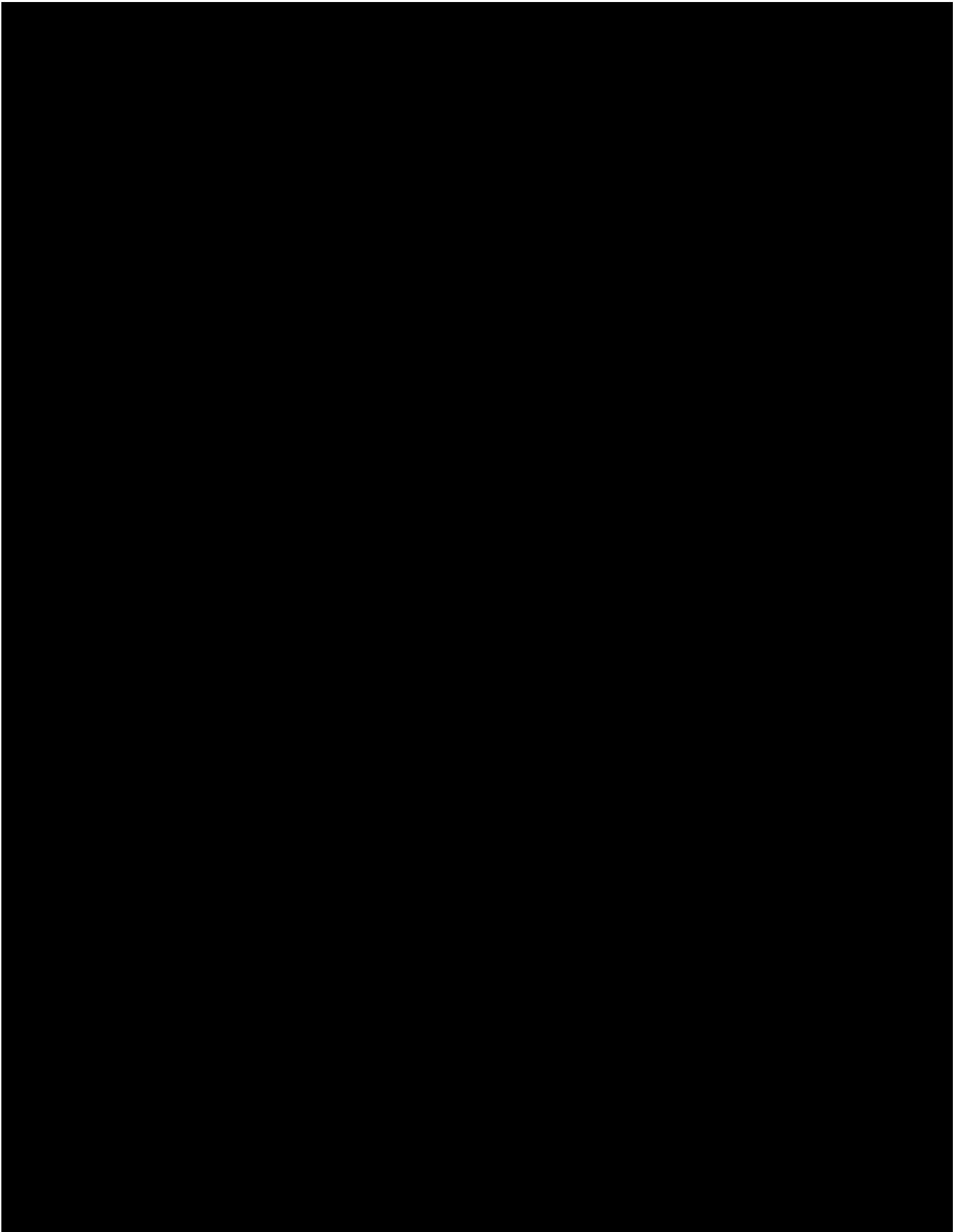


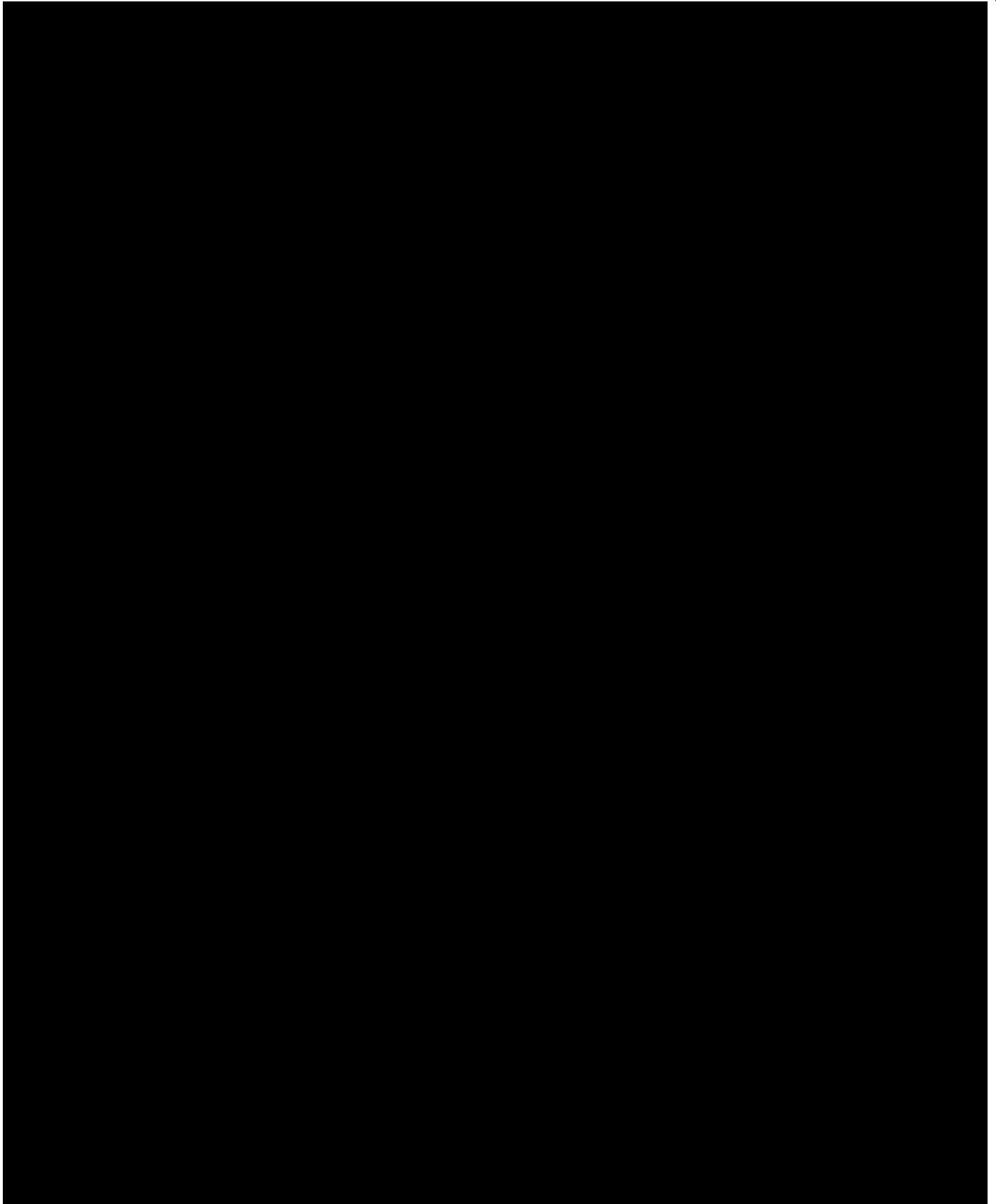


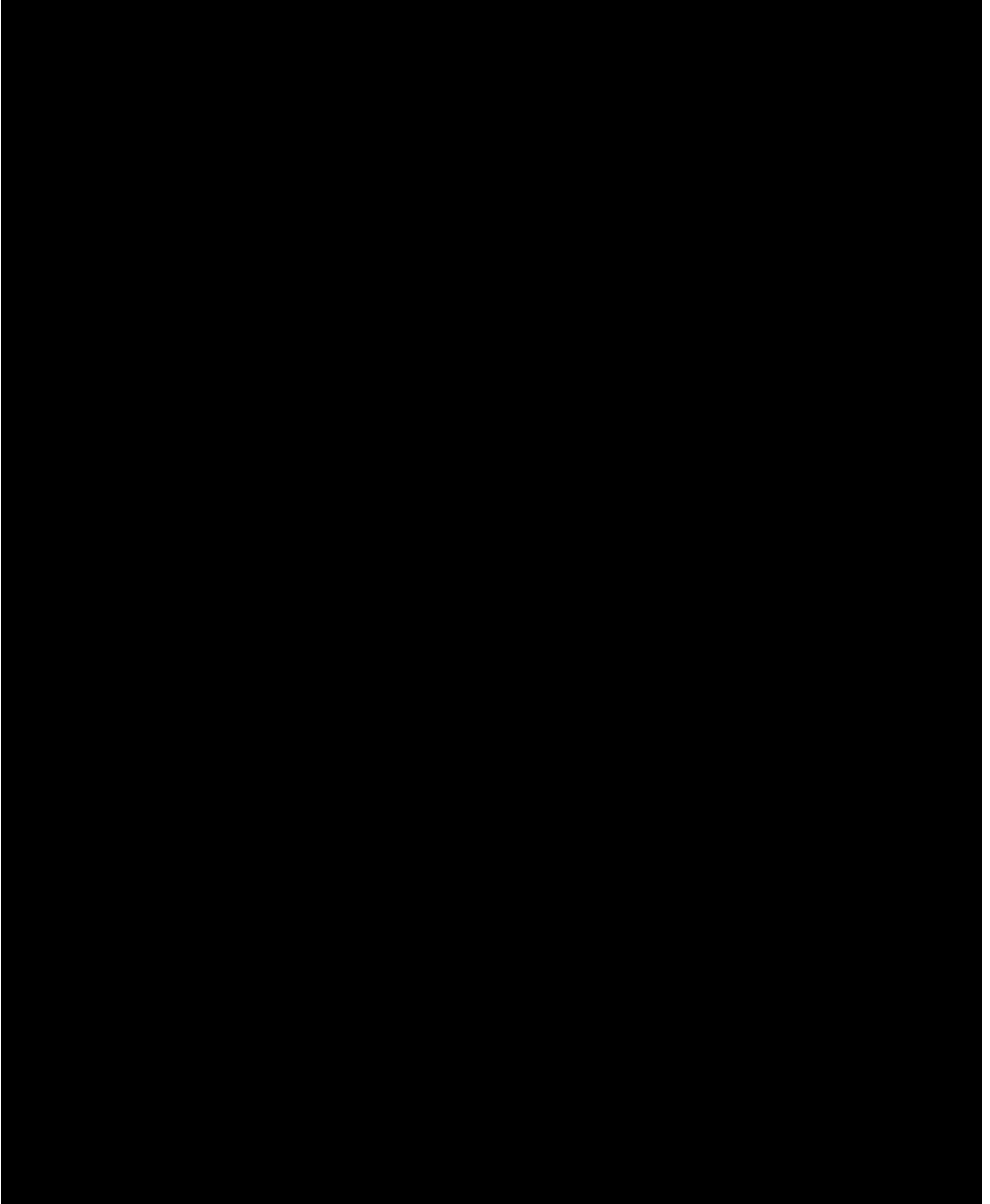


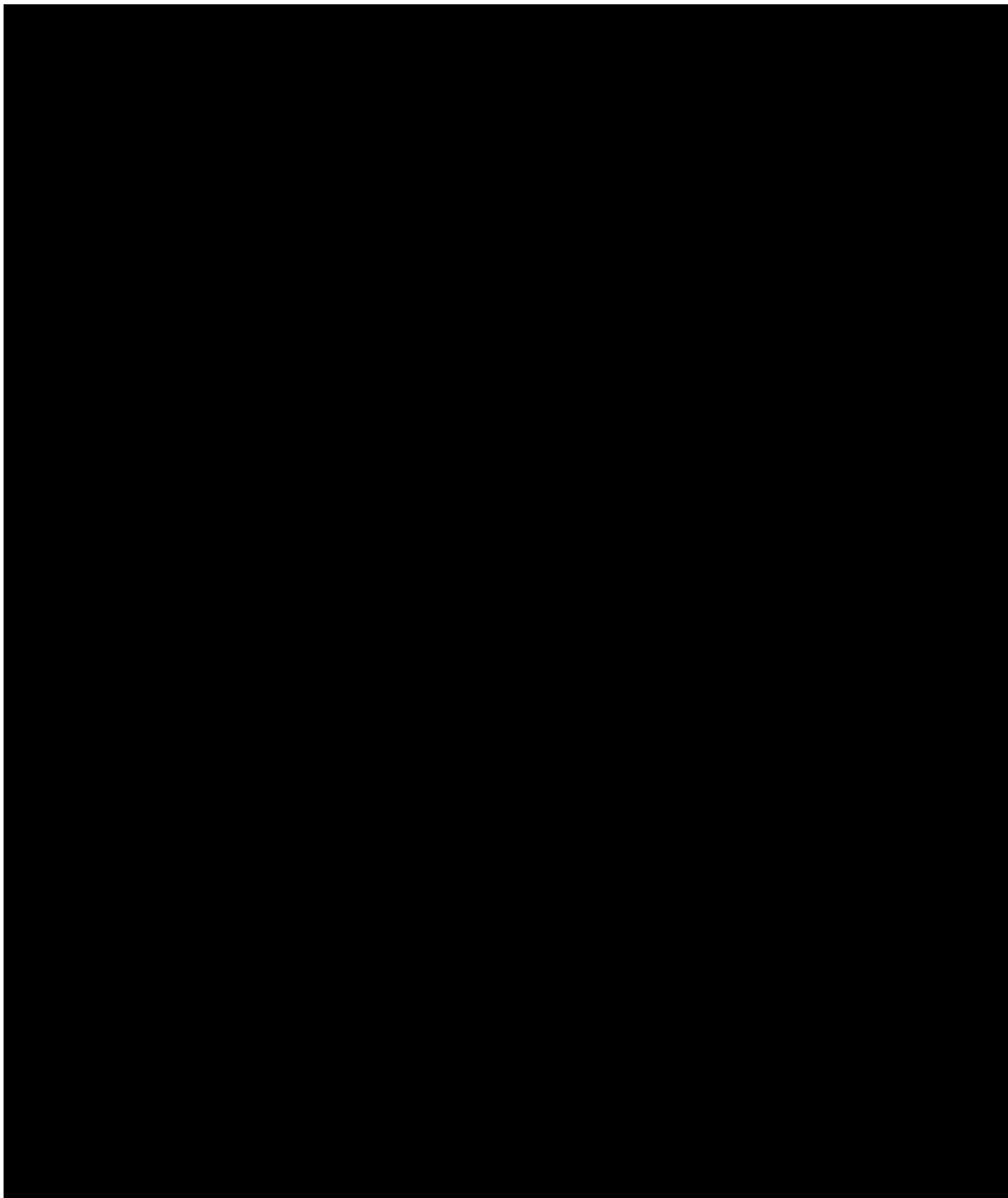






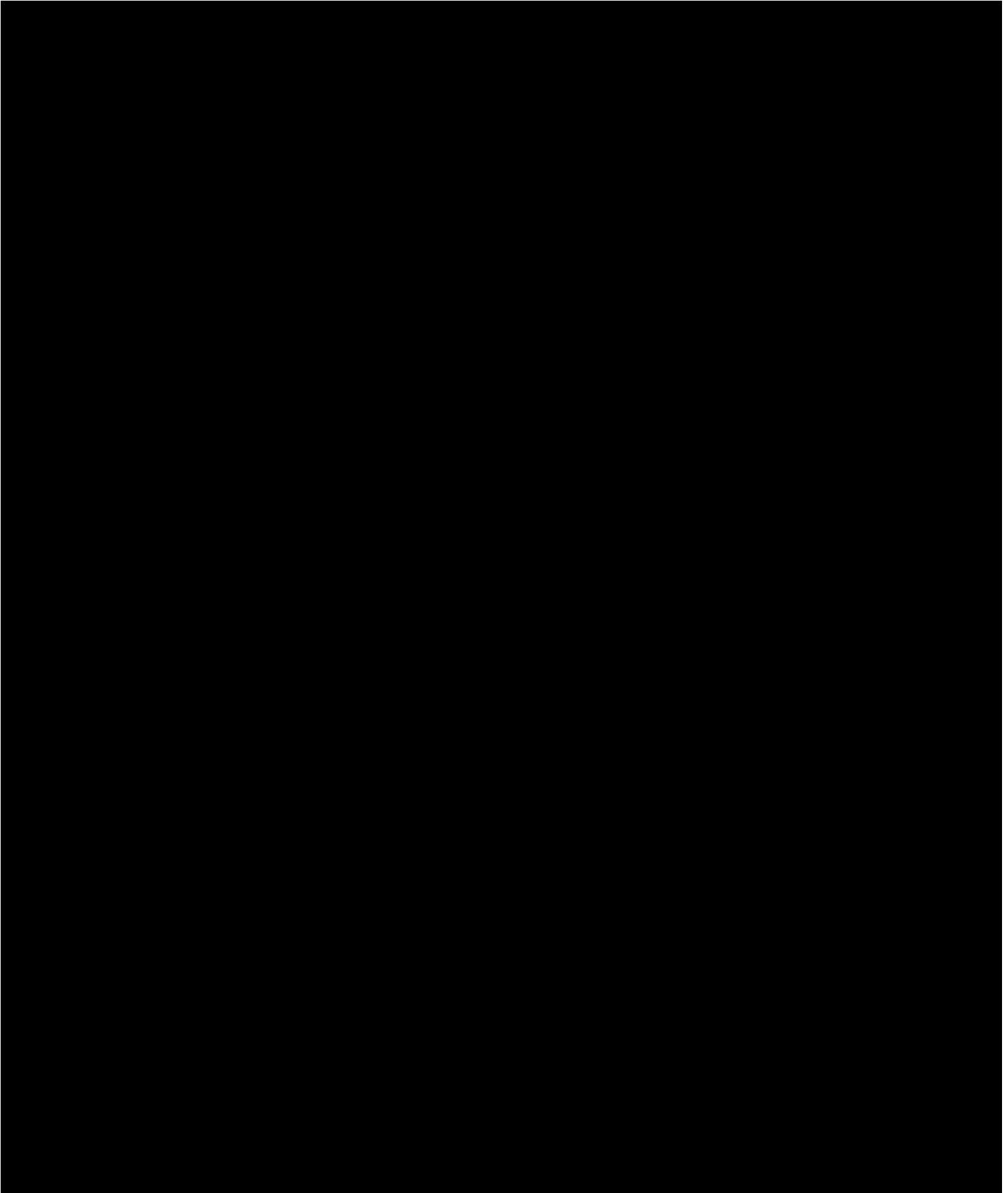


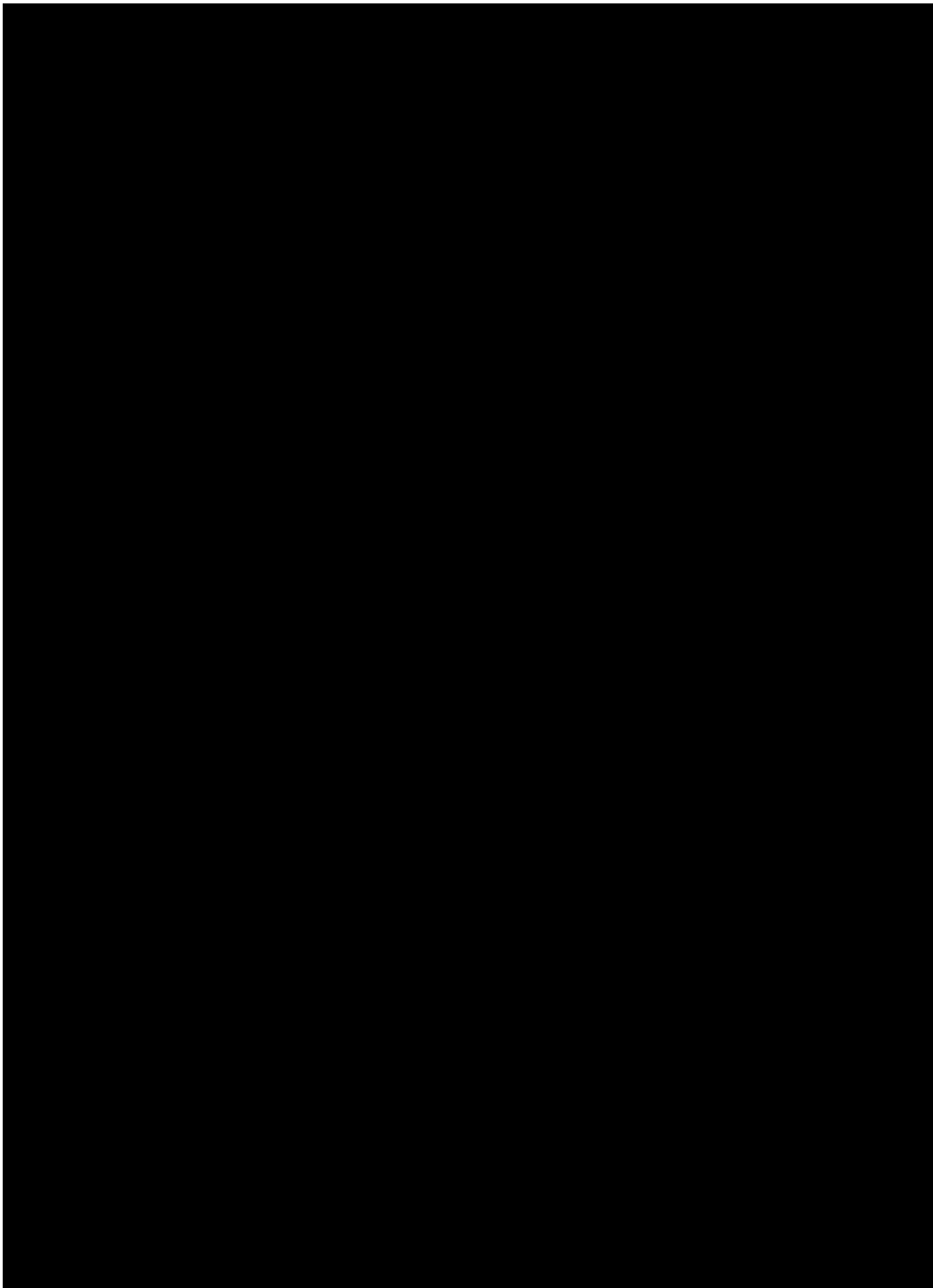


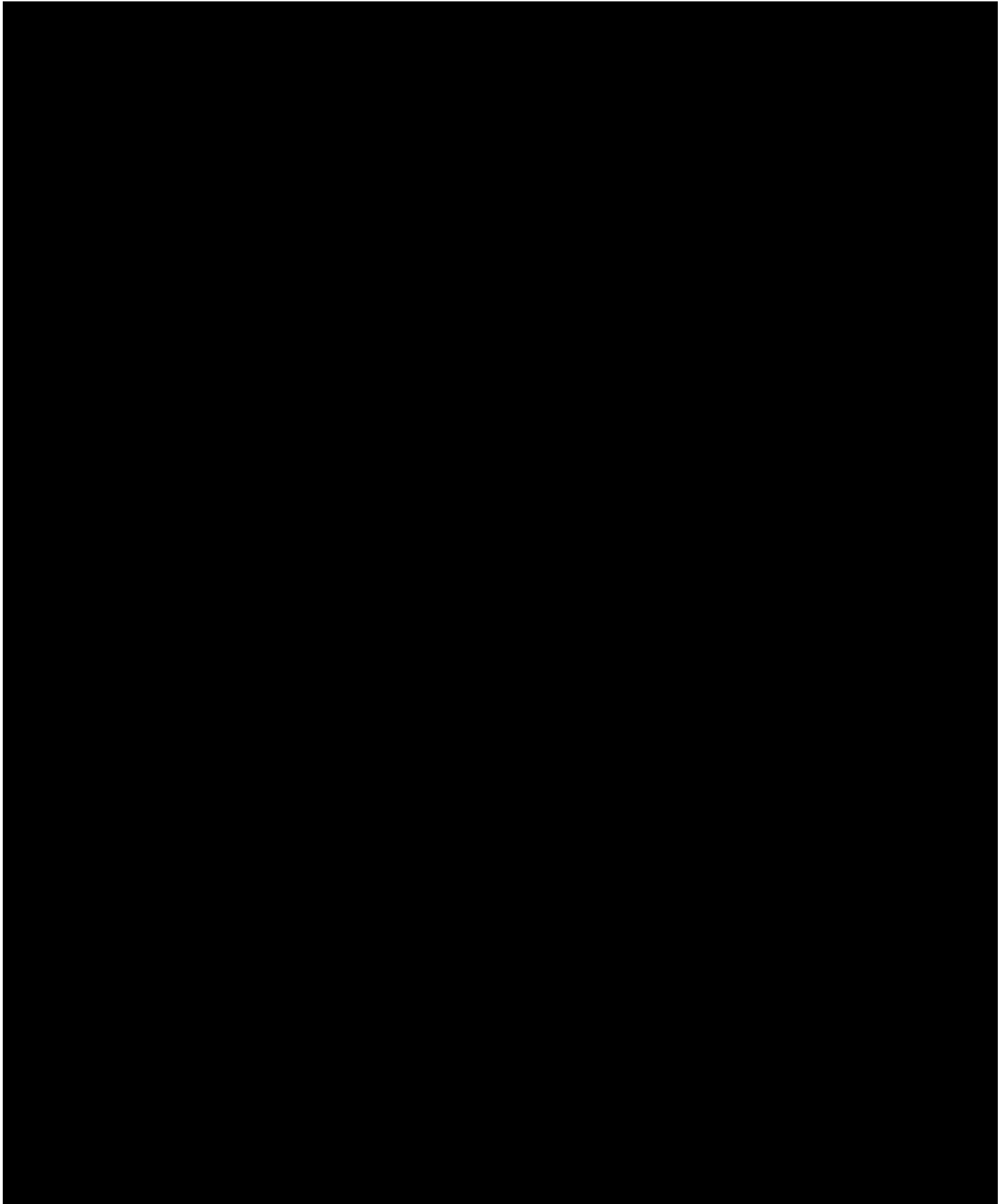


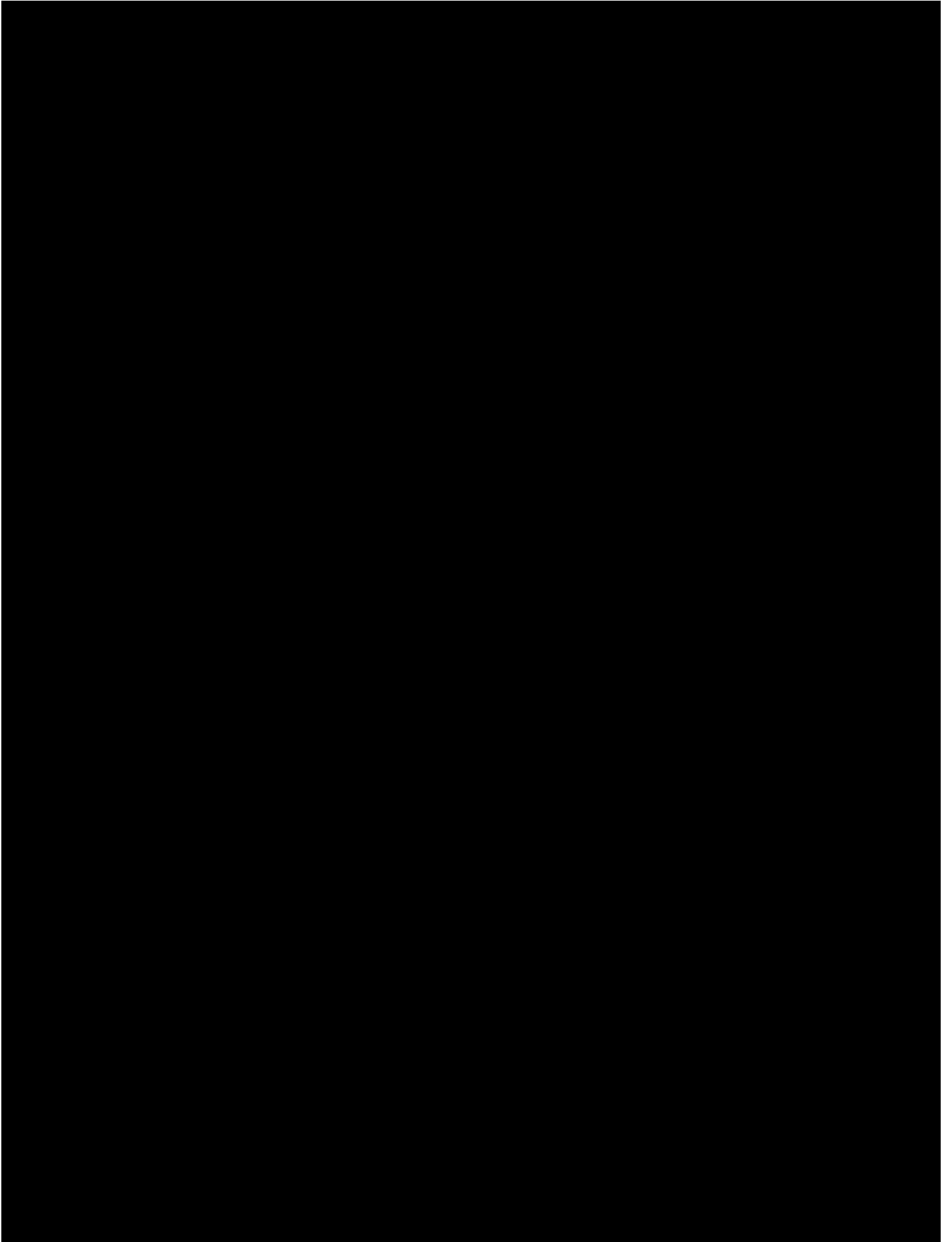
36. In particular, as referenced above, based on my training and experience, I know that individuals engaged in criminal conduct who have knowledge of end-to-end encrypted communication services and applications ("Encrypted Applications"), such as WhatsApp, *see supra* ¶¶ 10(e), 13(e), 14(g), 30(a), often use such Encrypted Applications to engage in communications relating to their schemes precisely because they know that such encrypted communications cannot be intercepted by law enforcement or searched without access to the individual's specific account. Providers of Encrypted Applications typically do not have the ability to produce the contents of such communications to law enforcement, or even provide toll or header data regarding the communications, because they do not collect or maintain this data. For example, based on my experience with WhatsApp, I understand that WhatsApp messages are specifically end-to-end encrypted to protect against third parties reading them. As a practical matter, the only potential means by which law enforcement can obtain comprehensive evidence of the content of the communications sent using Encrypted Applications is by conducting a search of the individual's cellphone or other electronic devices upon which the Encrypted Applications may be installed.

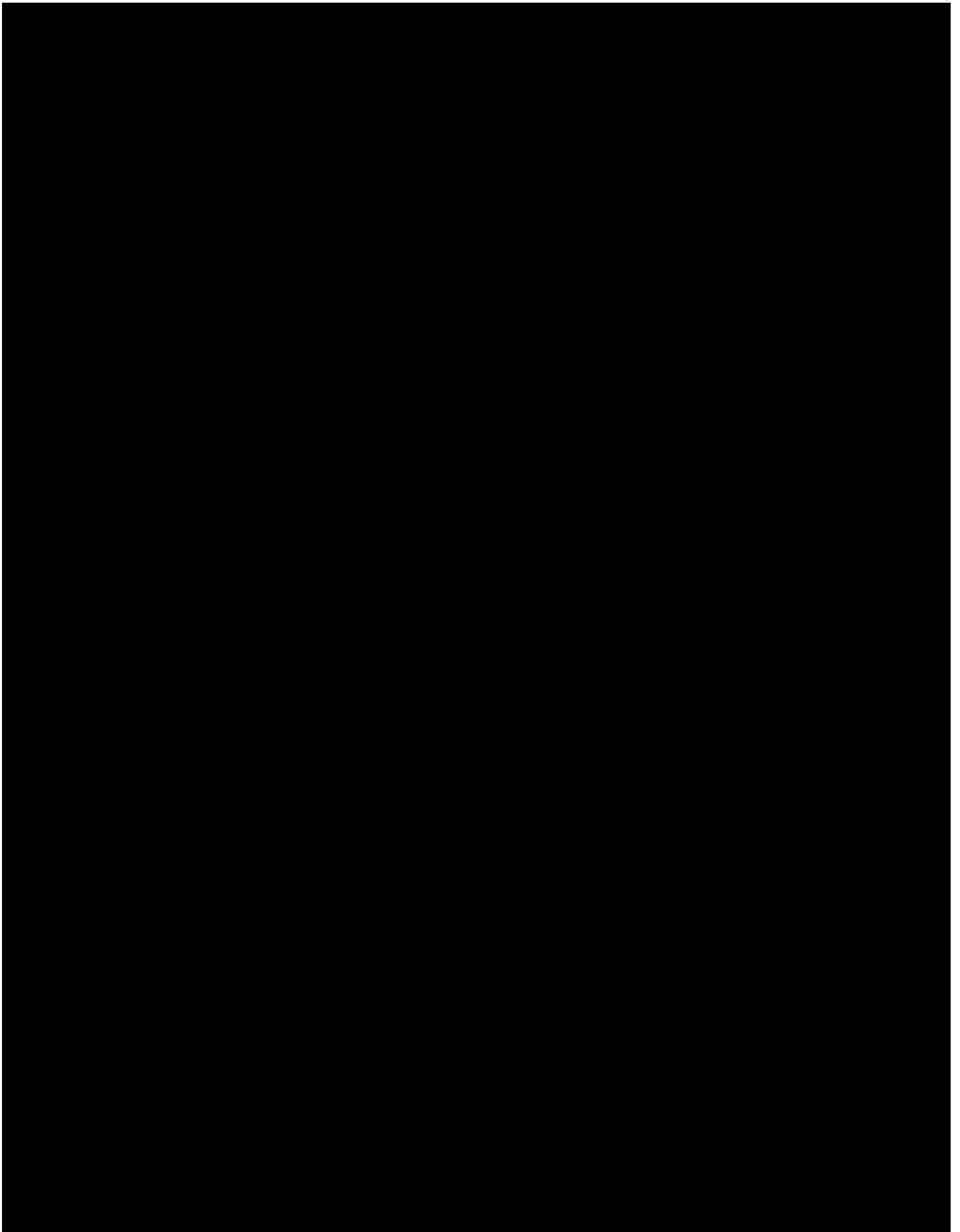
37. As set forth above, there is probable cause to believe that HANA is in possession of at least three electronic devices that he carries on his person—a Samsung cellphone, an Apple iPhone, and a Huawei cellphone—and that he is engaging in the Specified Federal Offenses using phone calls, text messages,

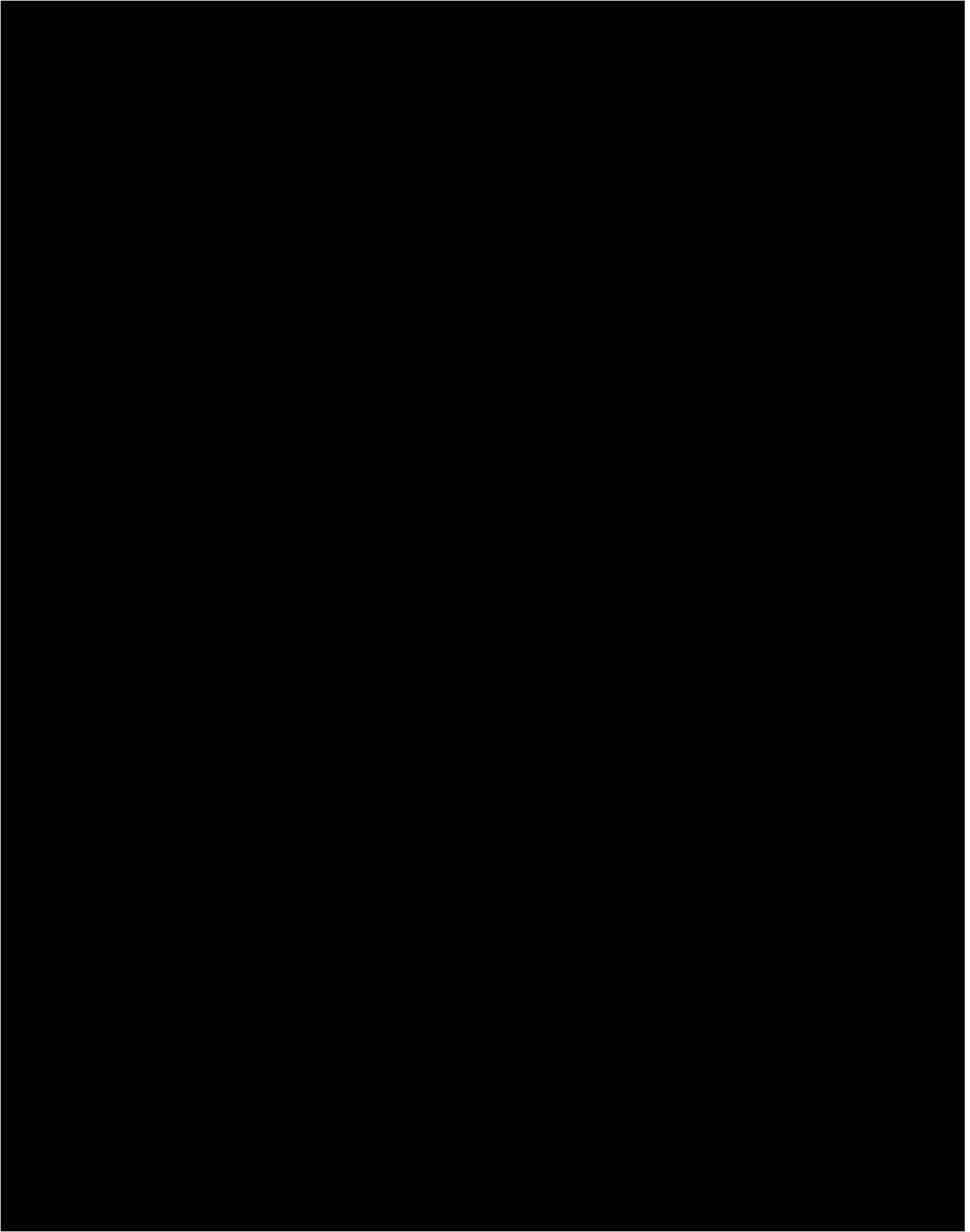


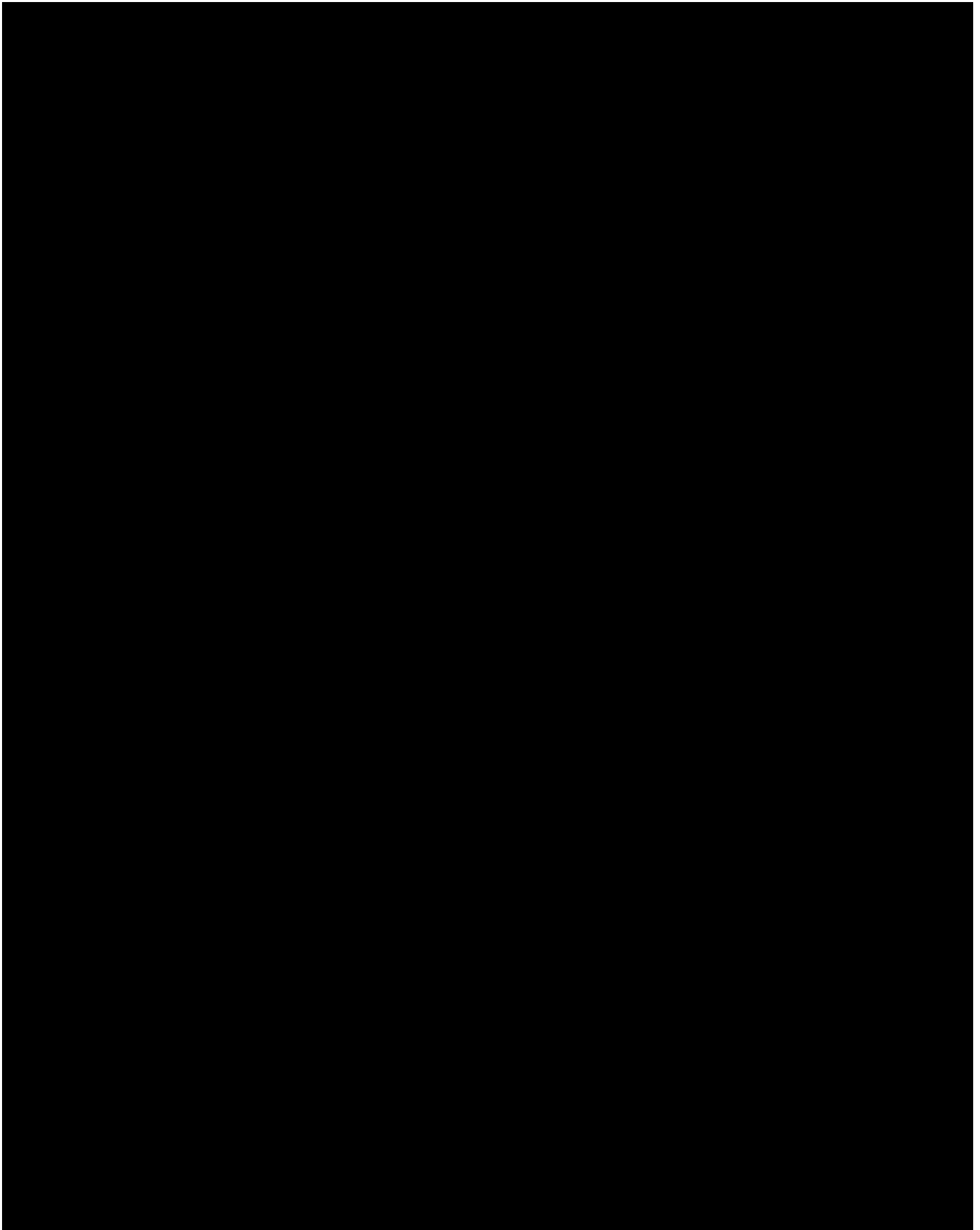


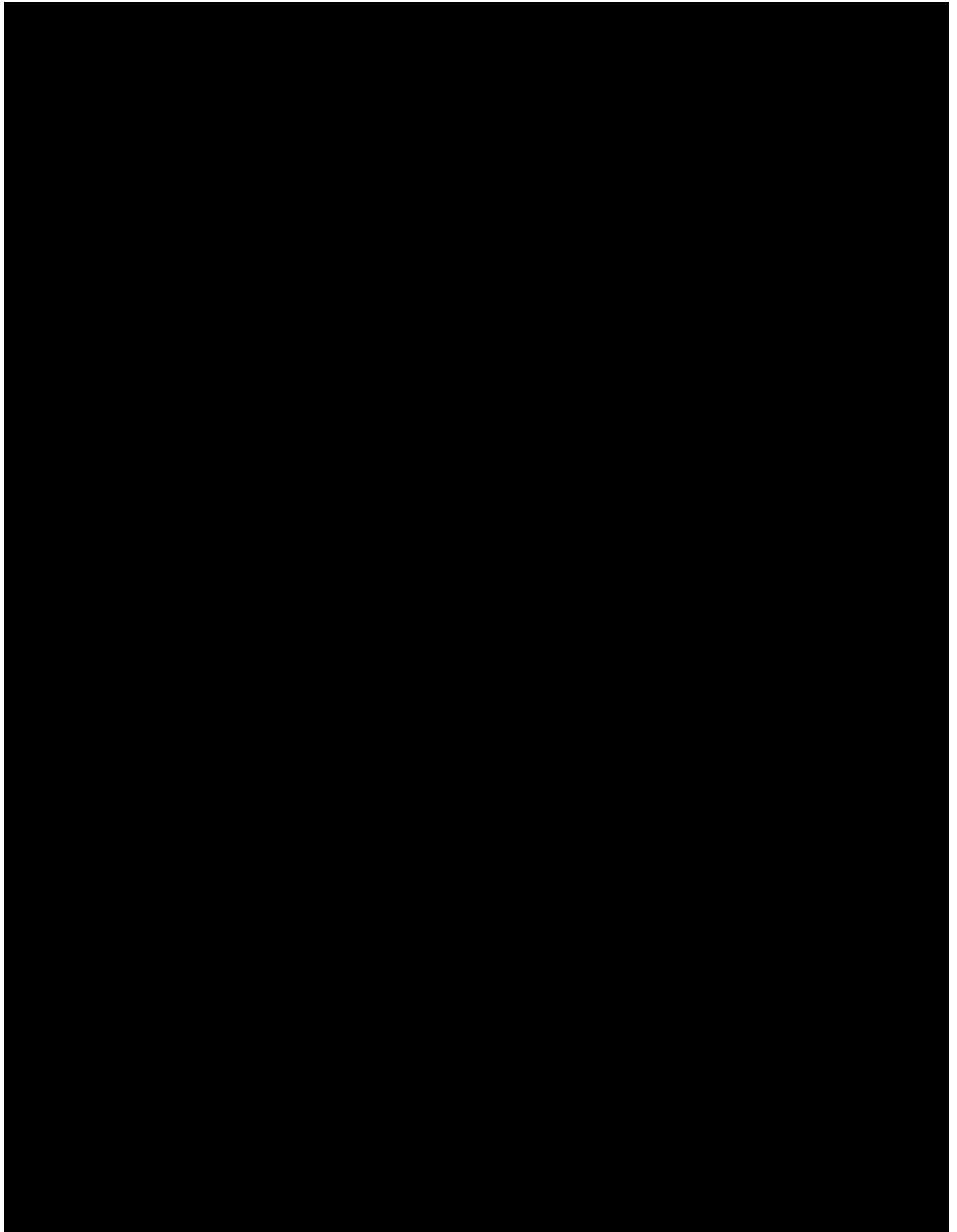


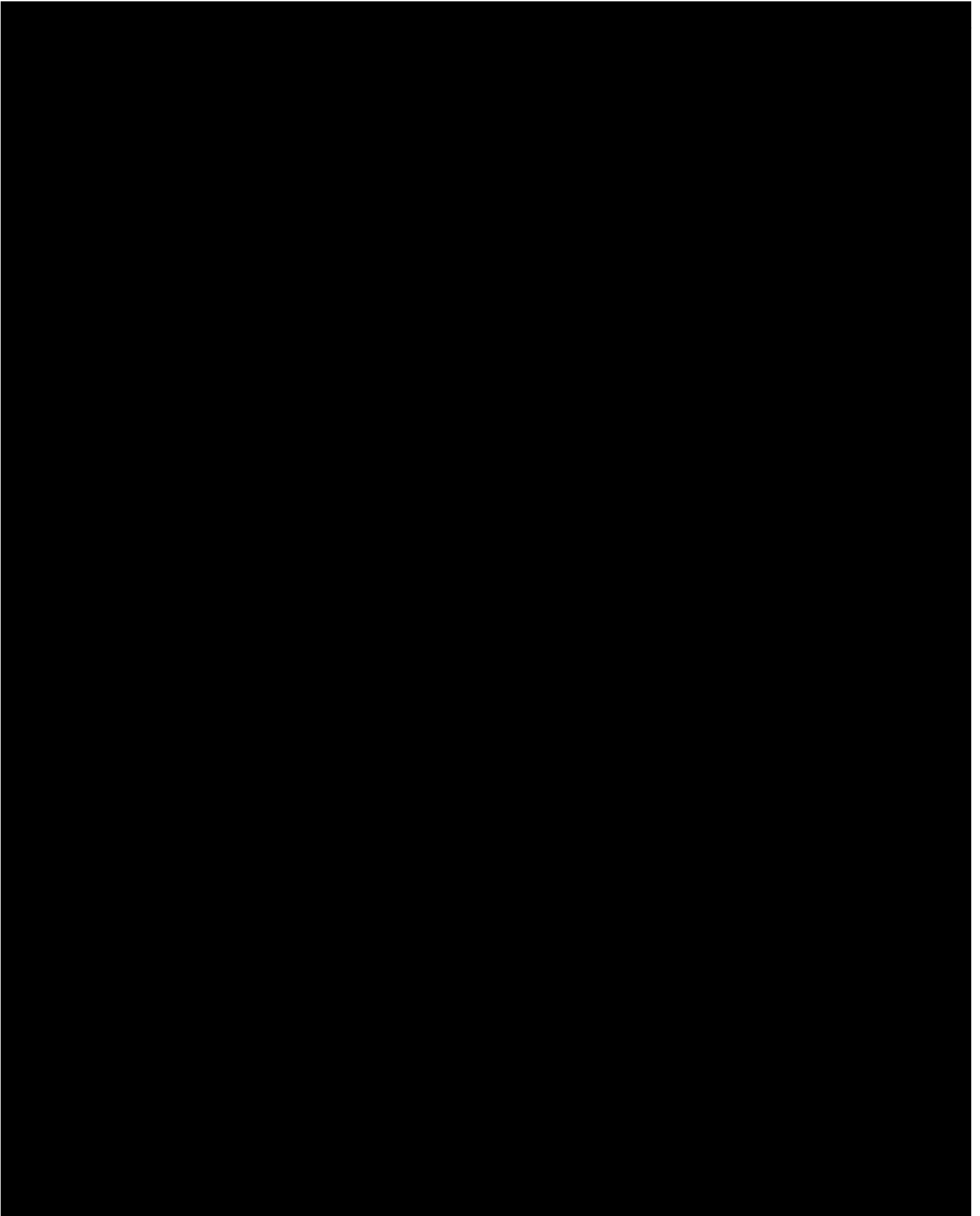


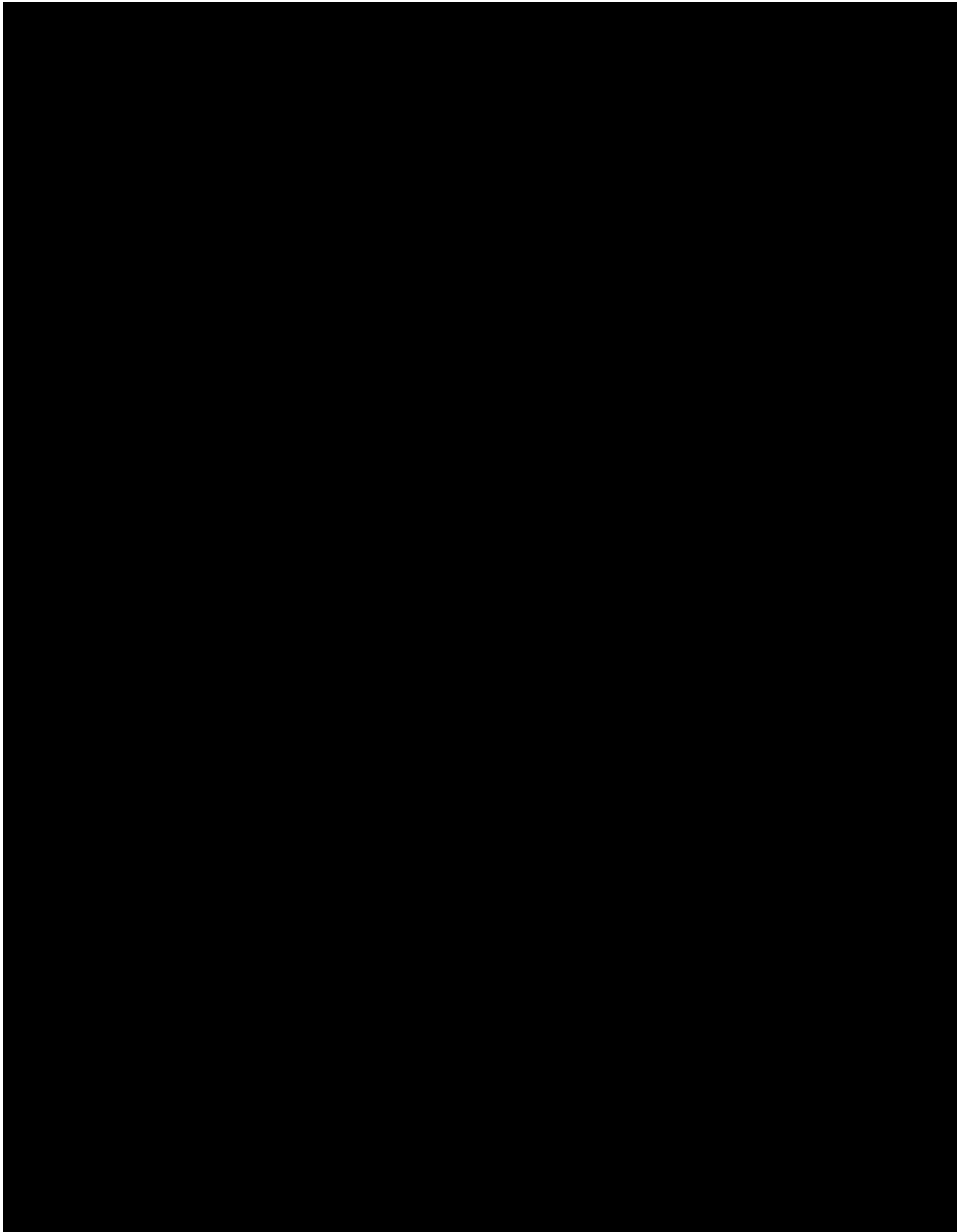


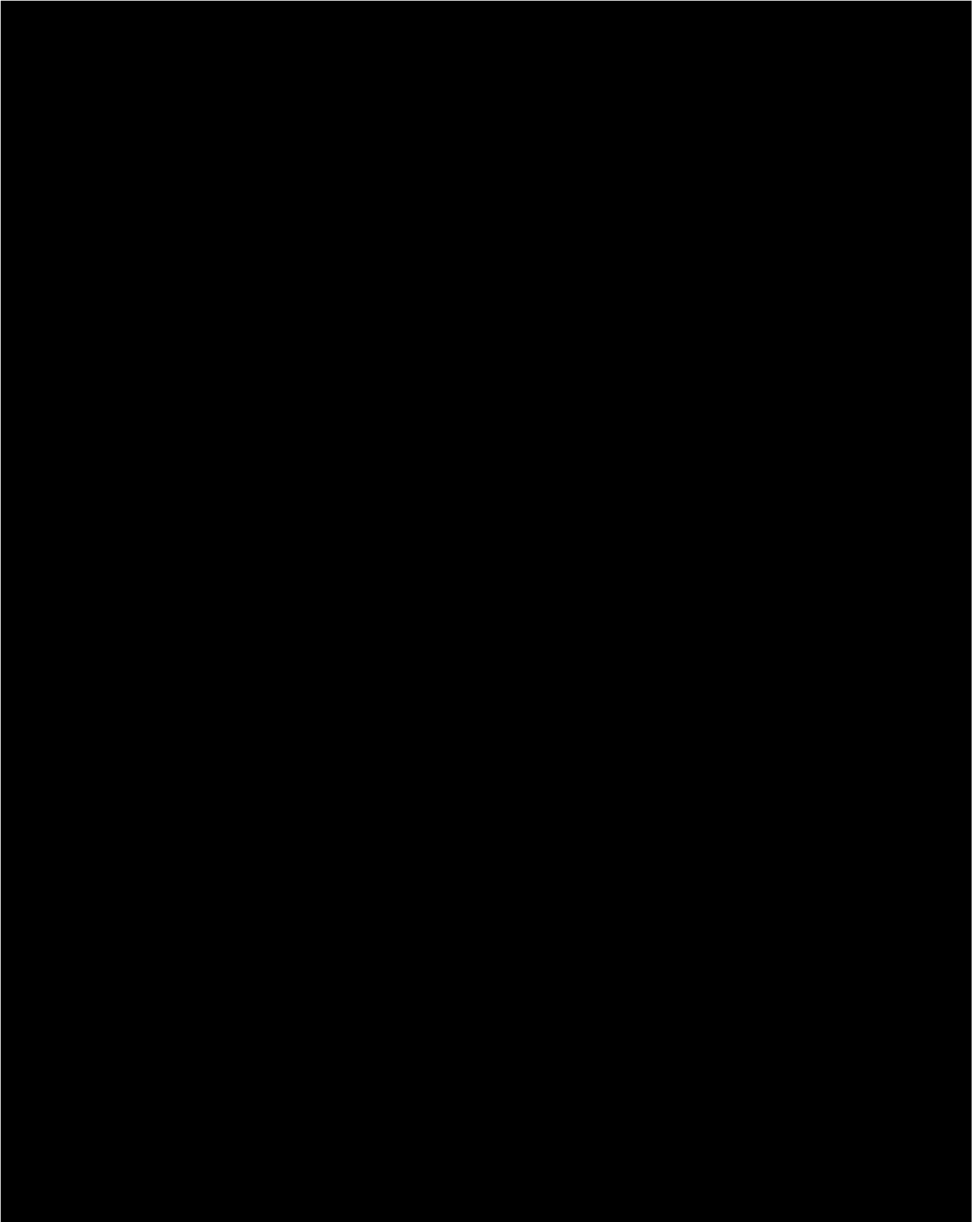


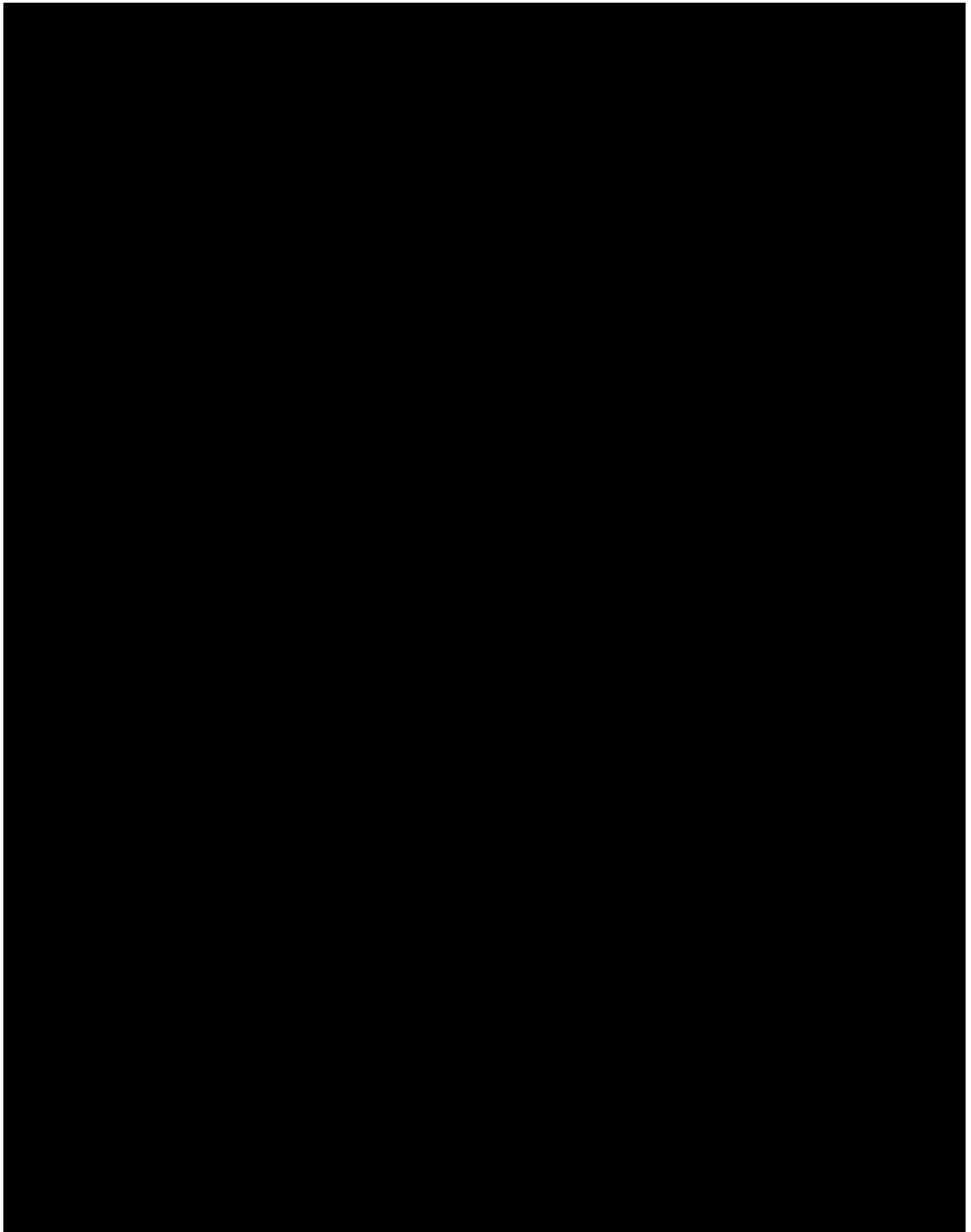


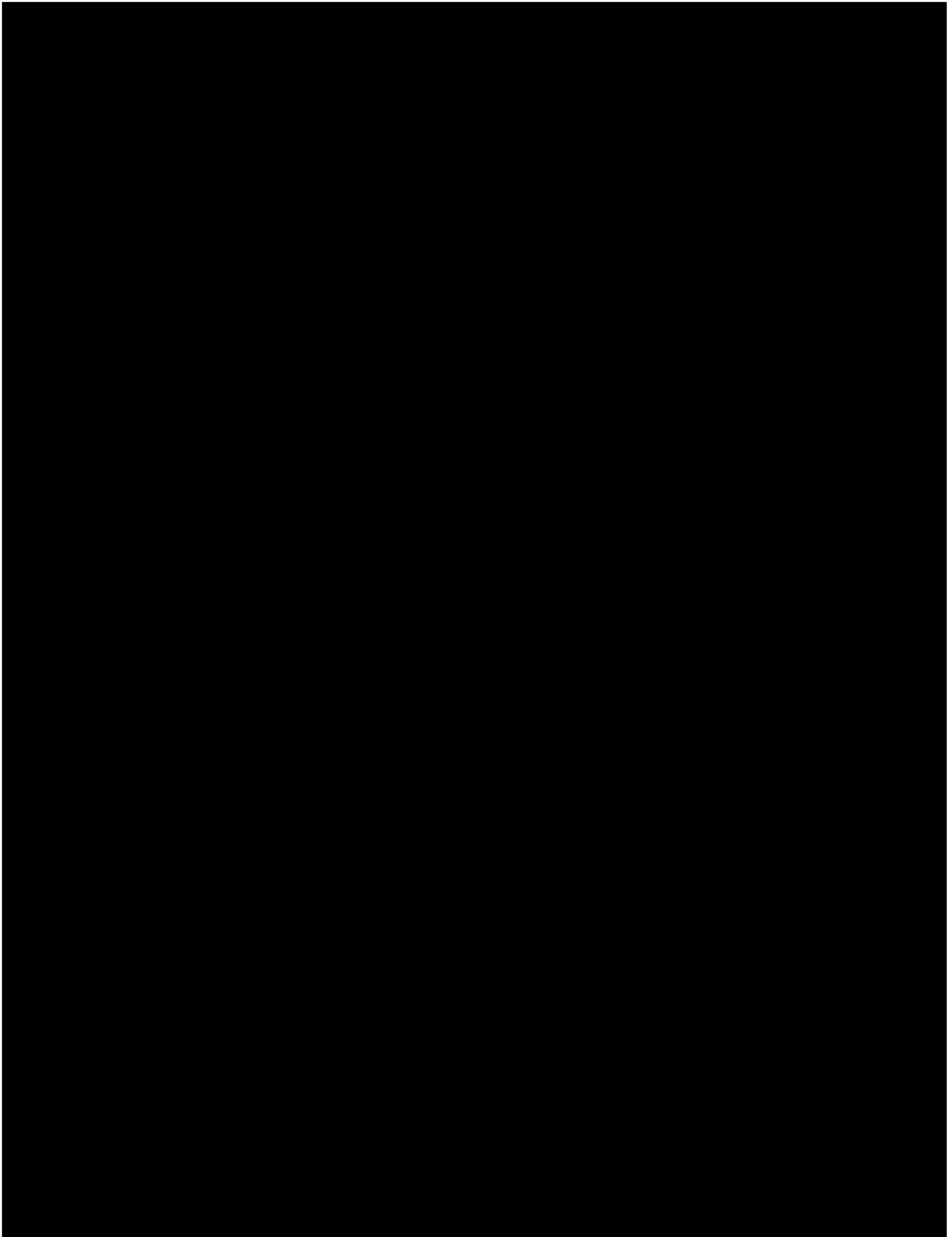


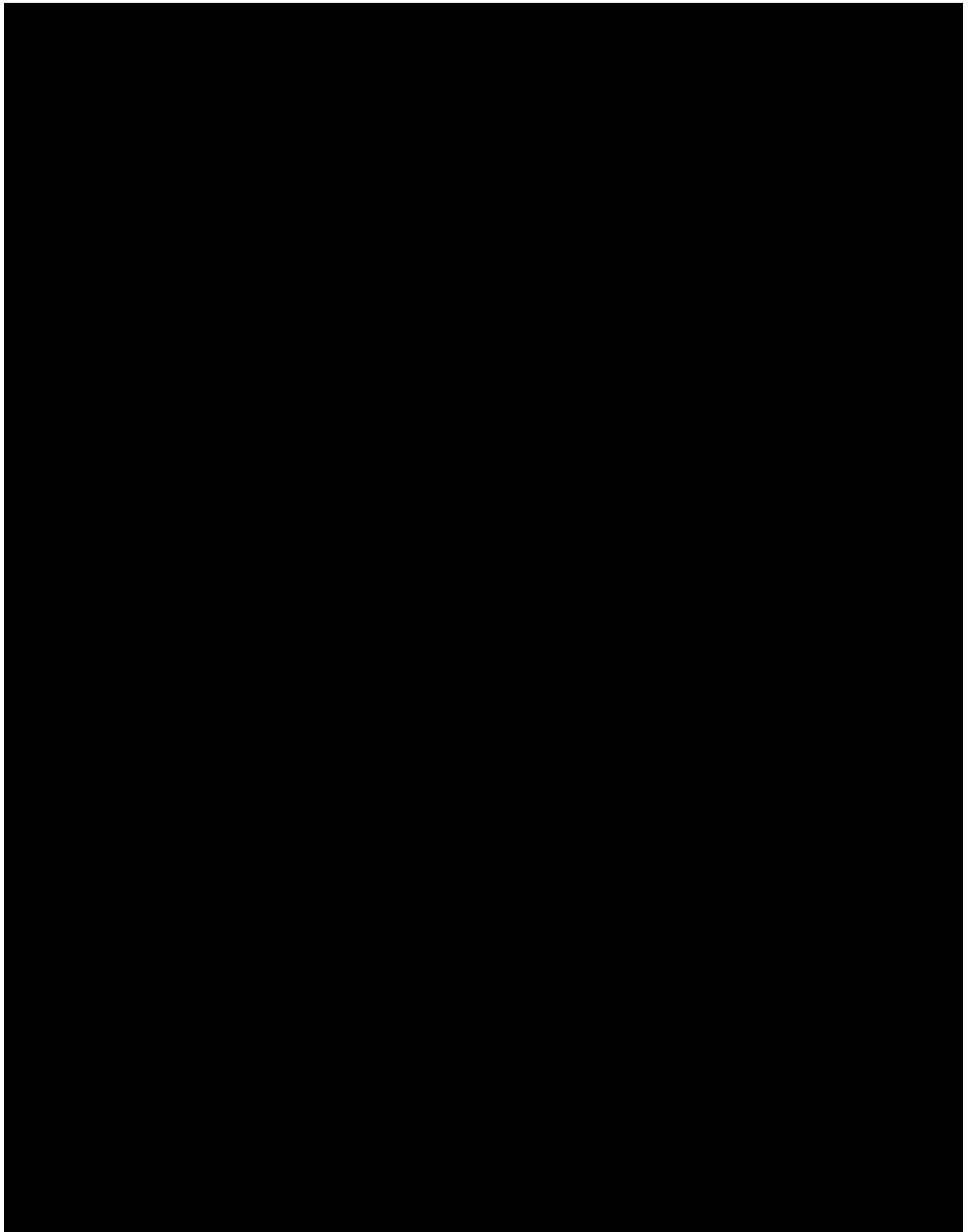


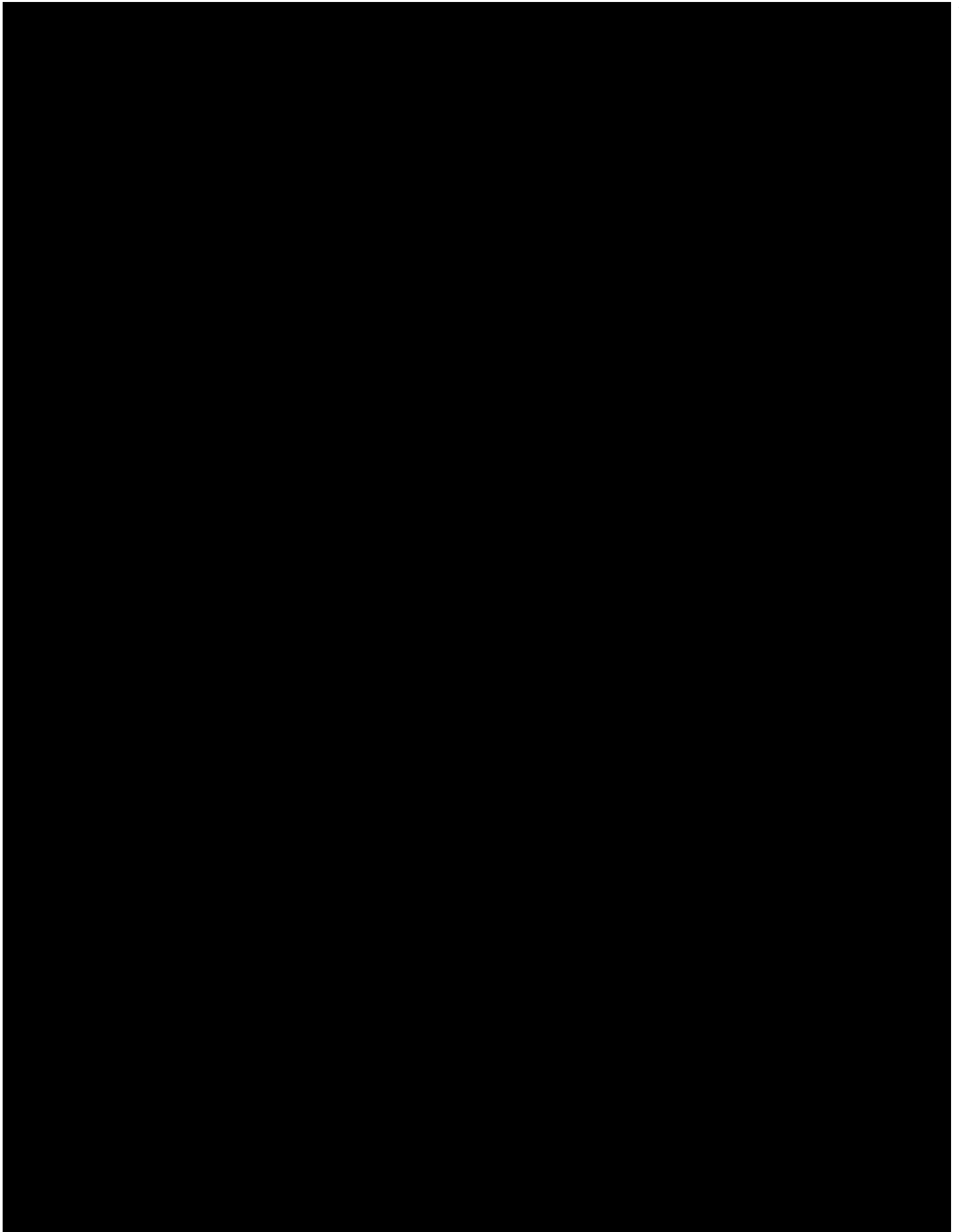


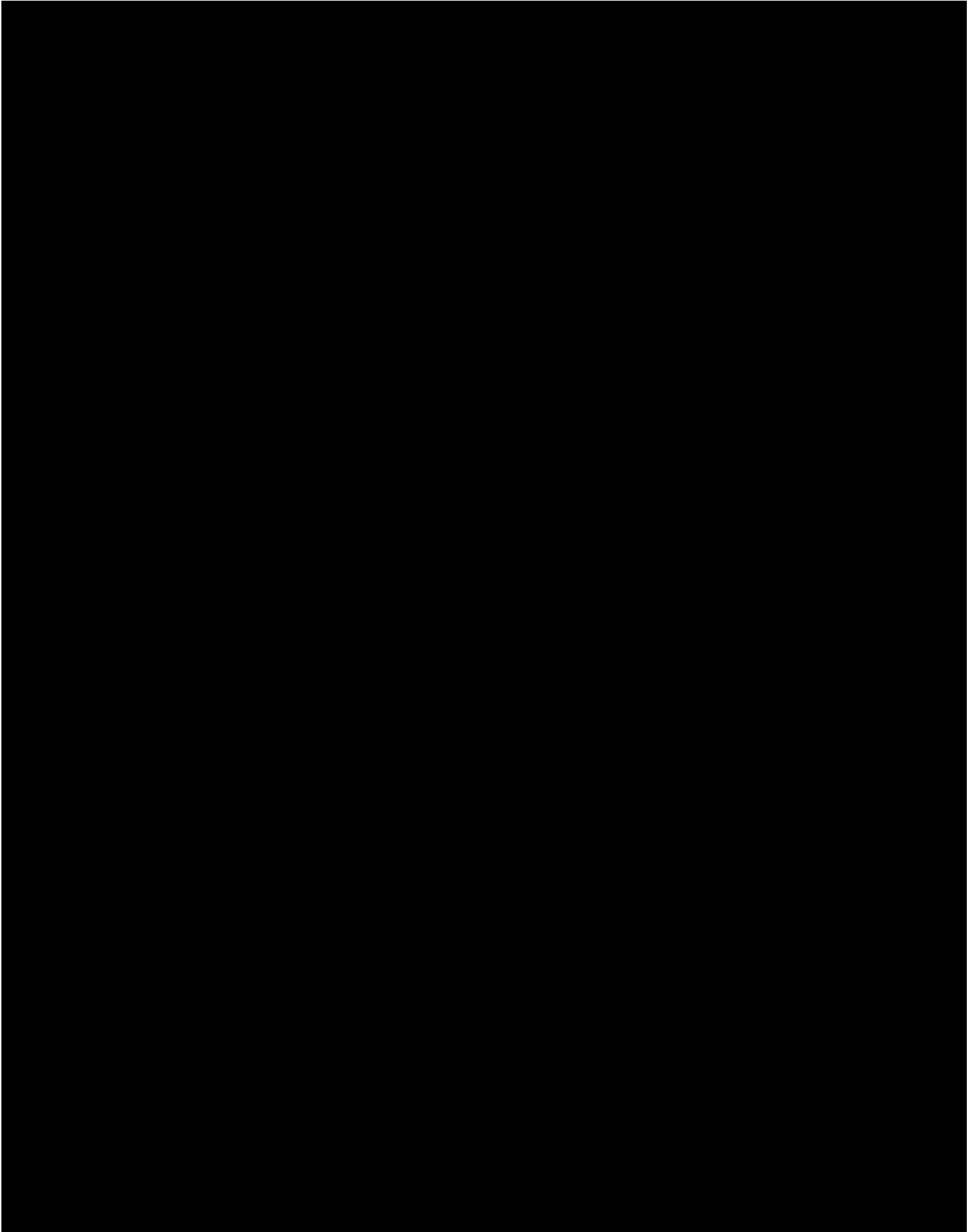


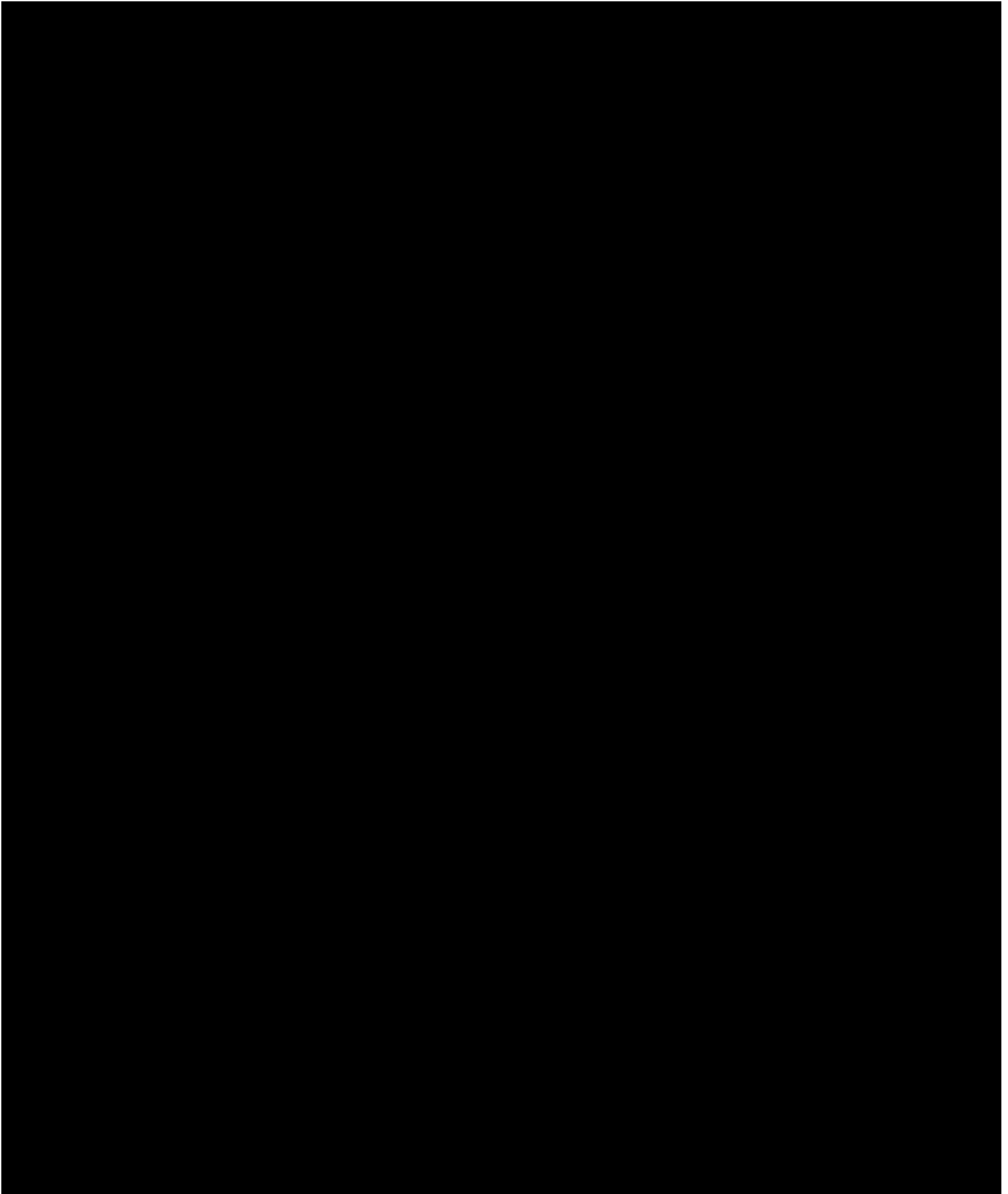


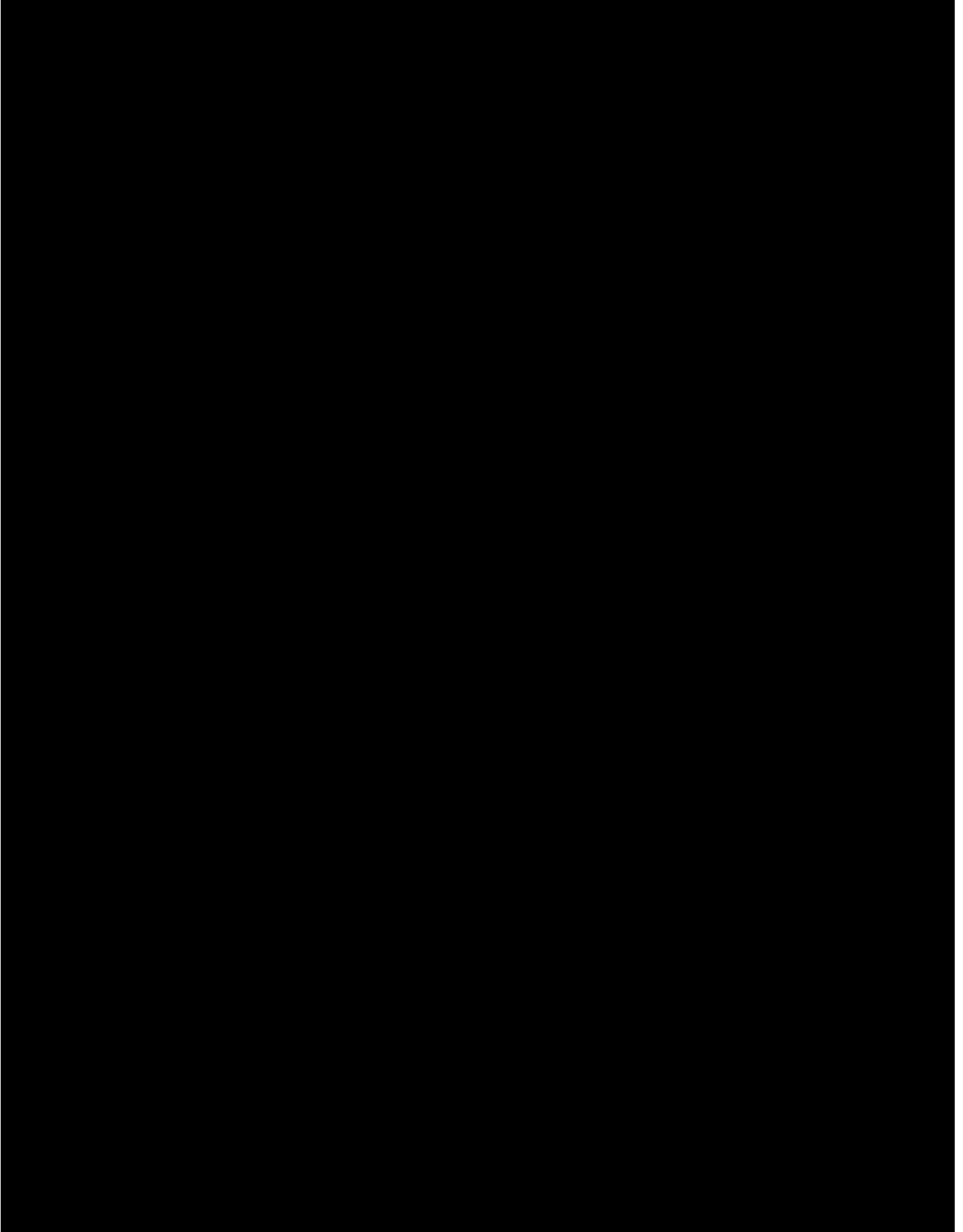


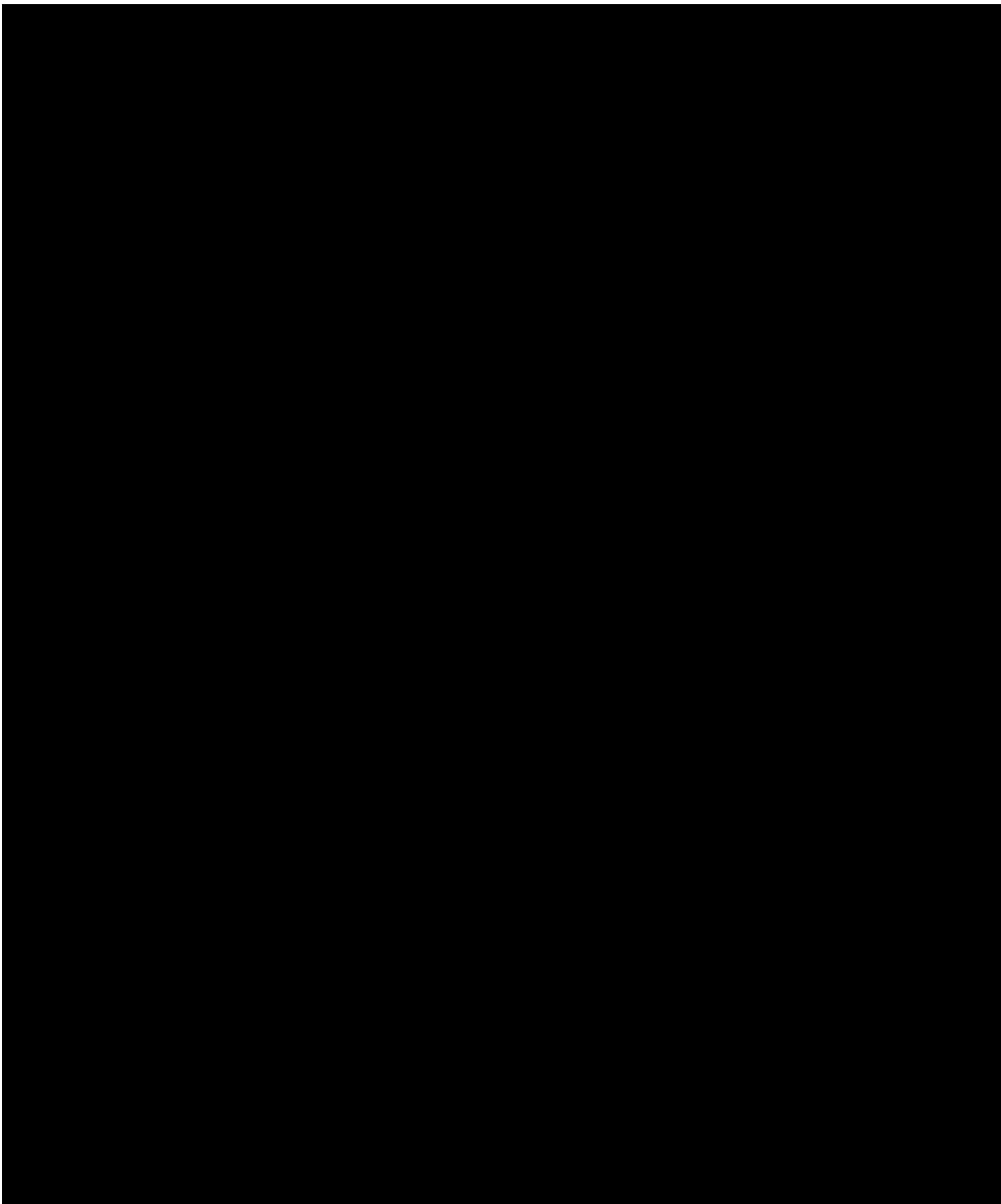


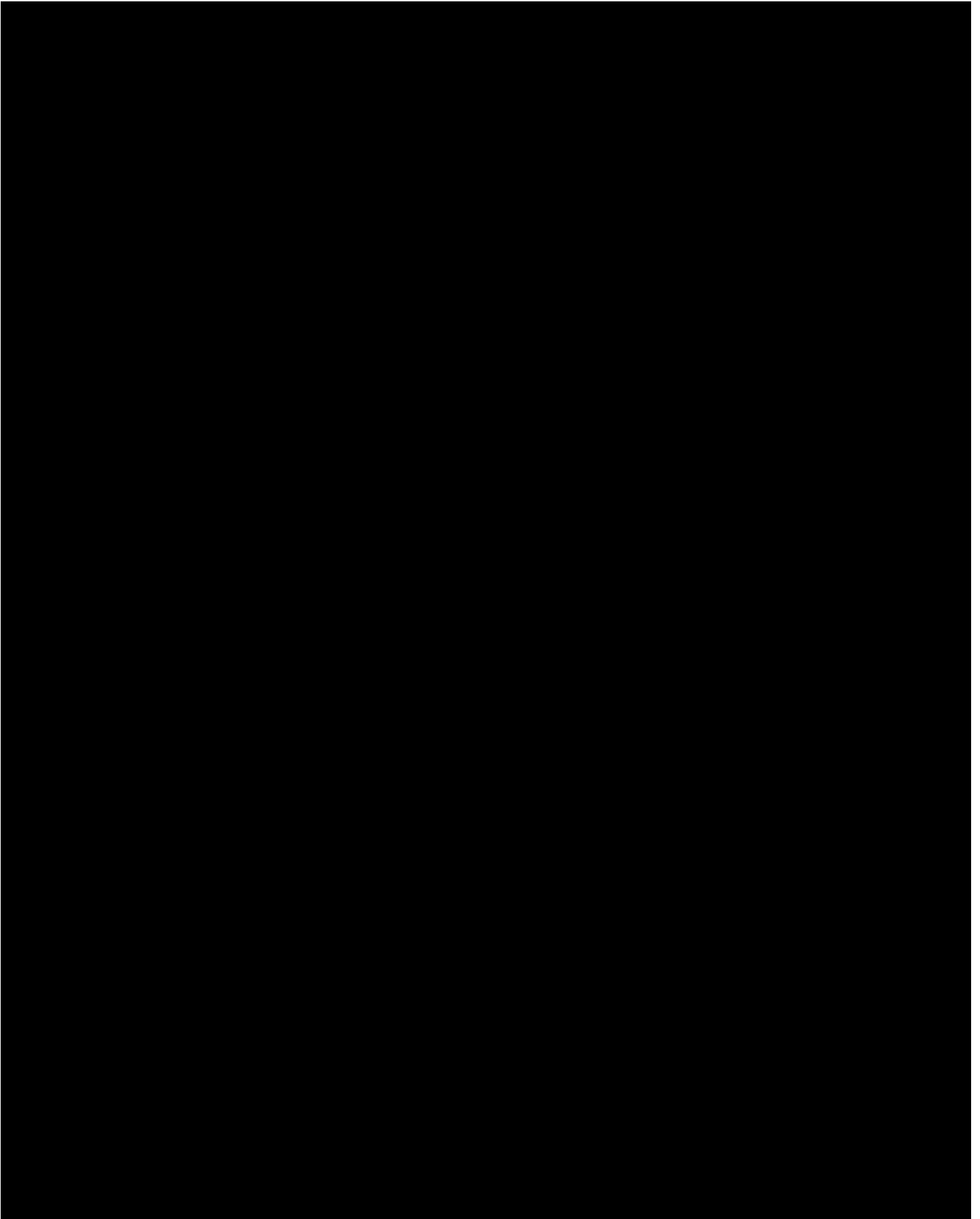


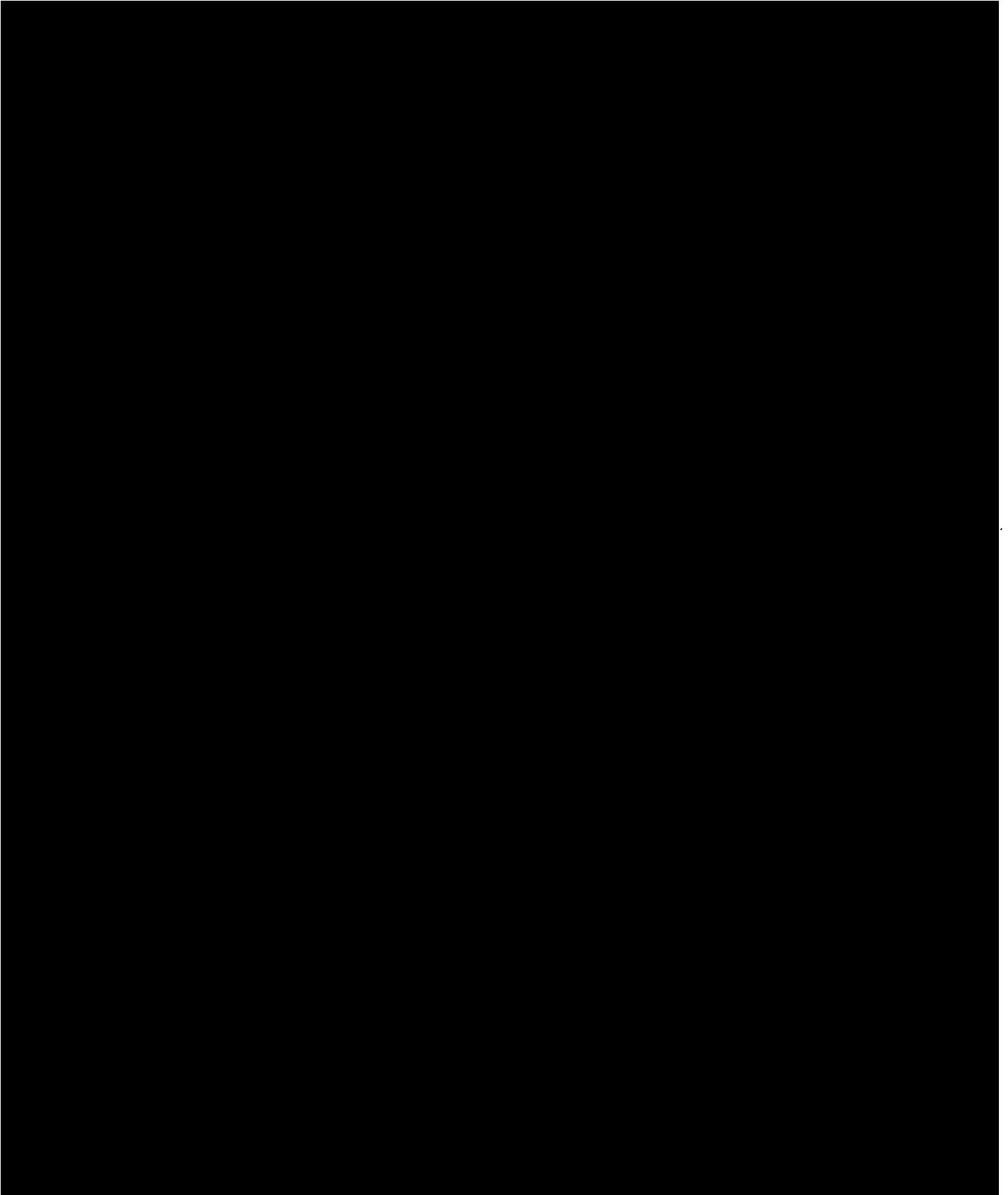


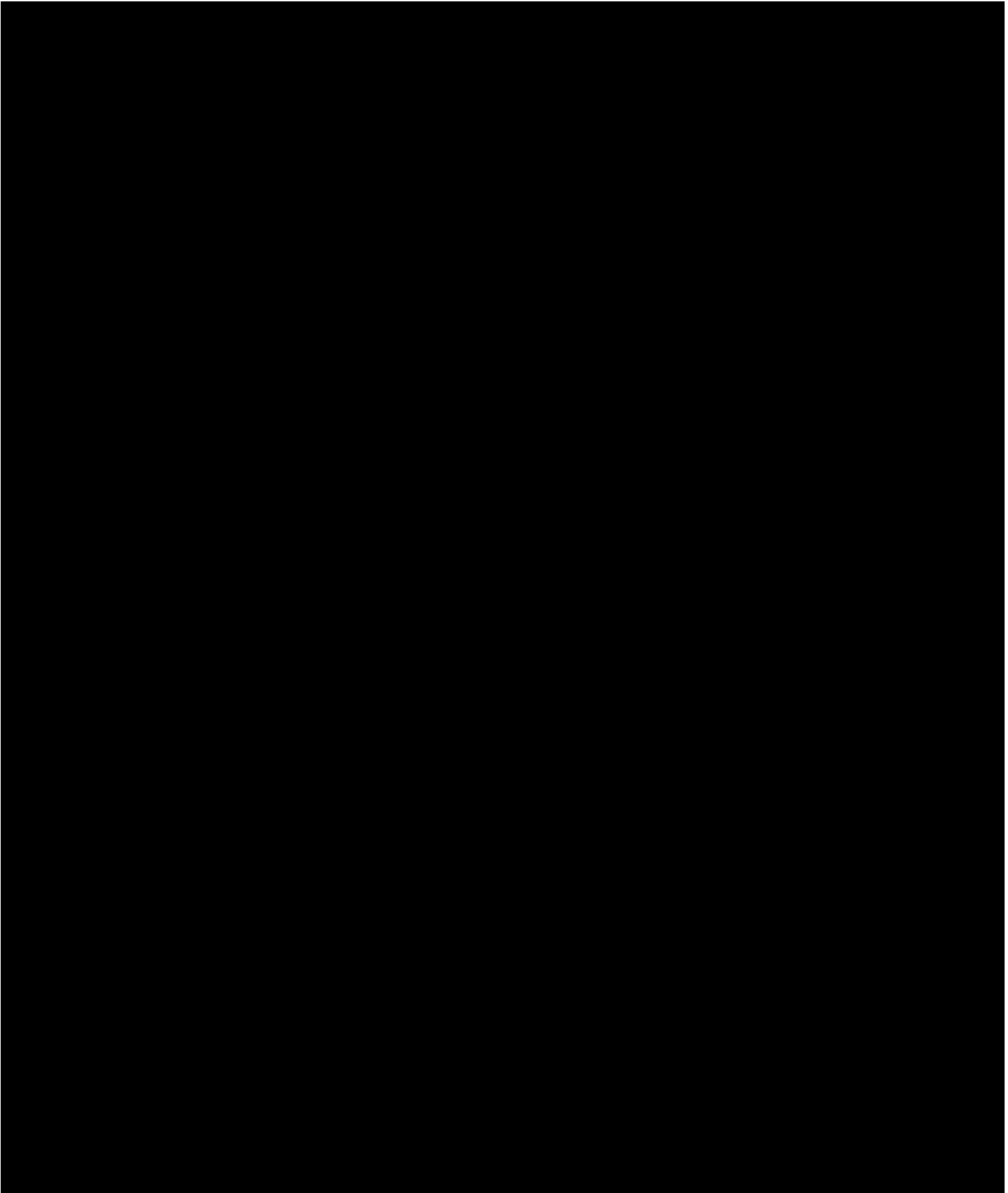


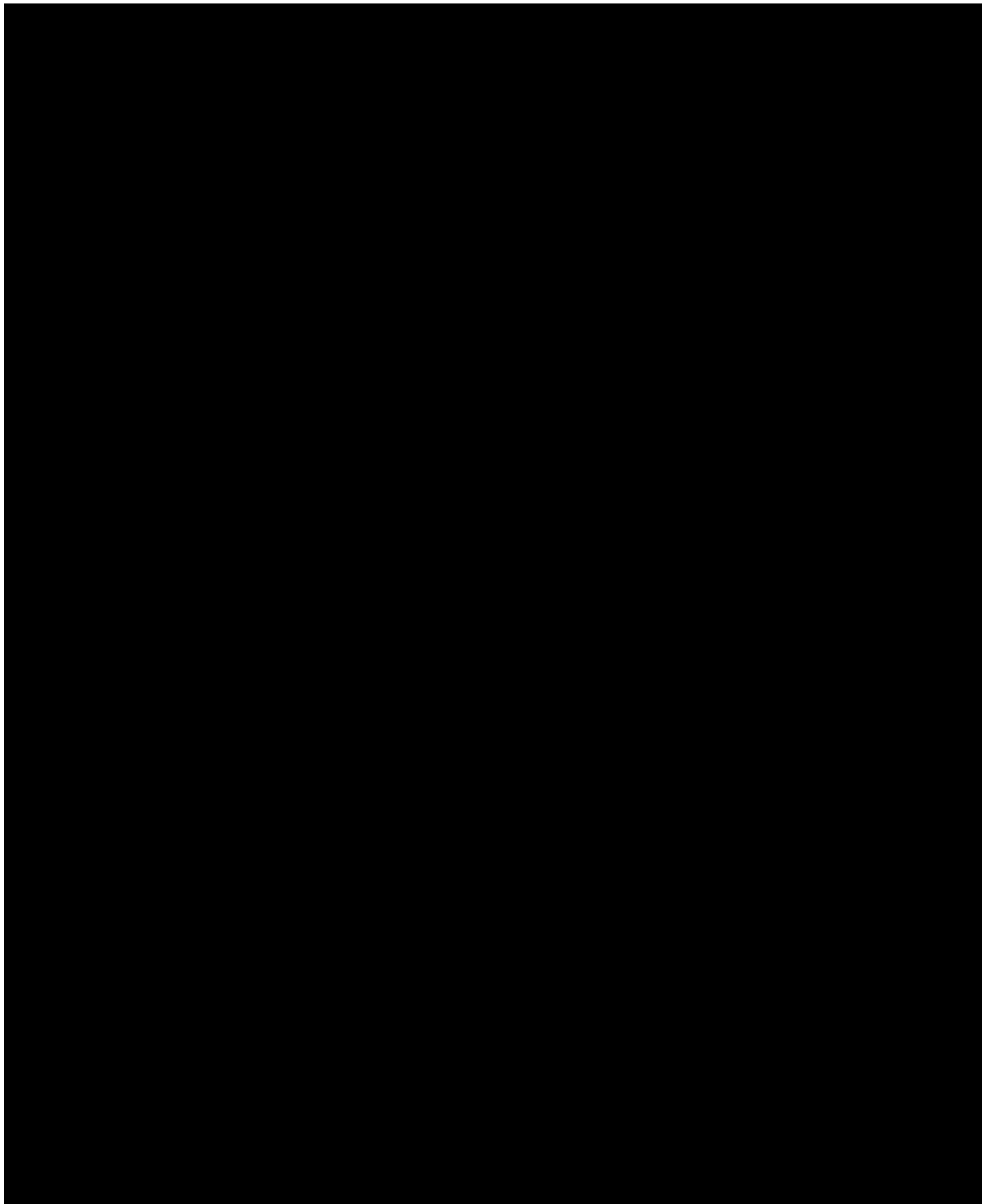


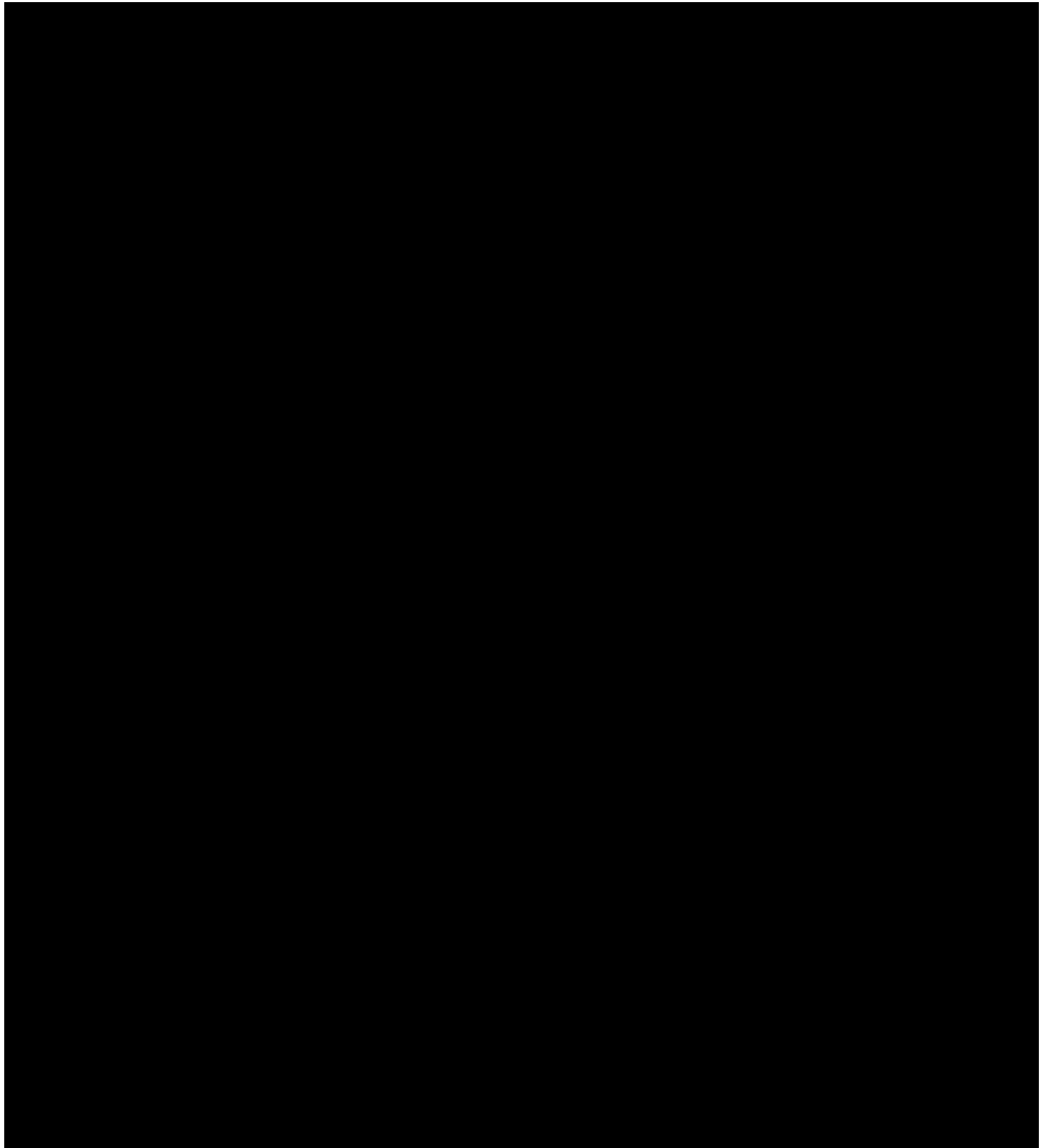


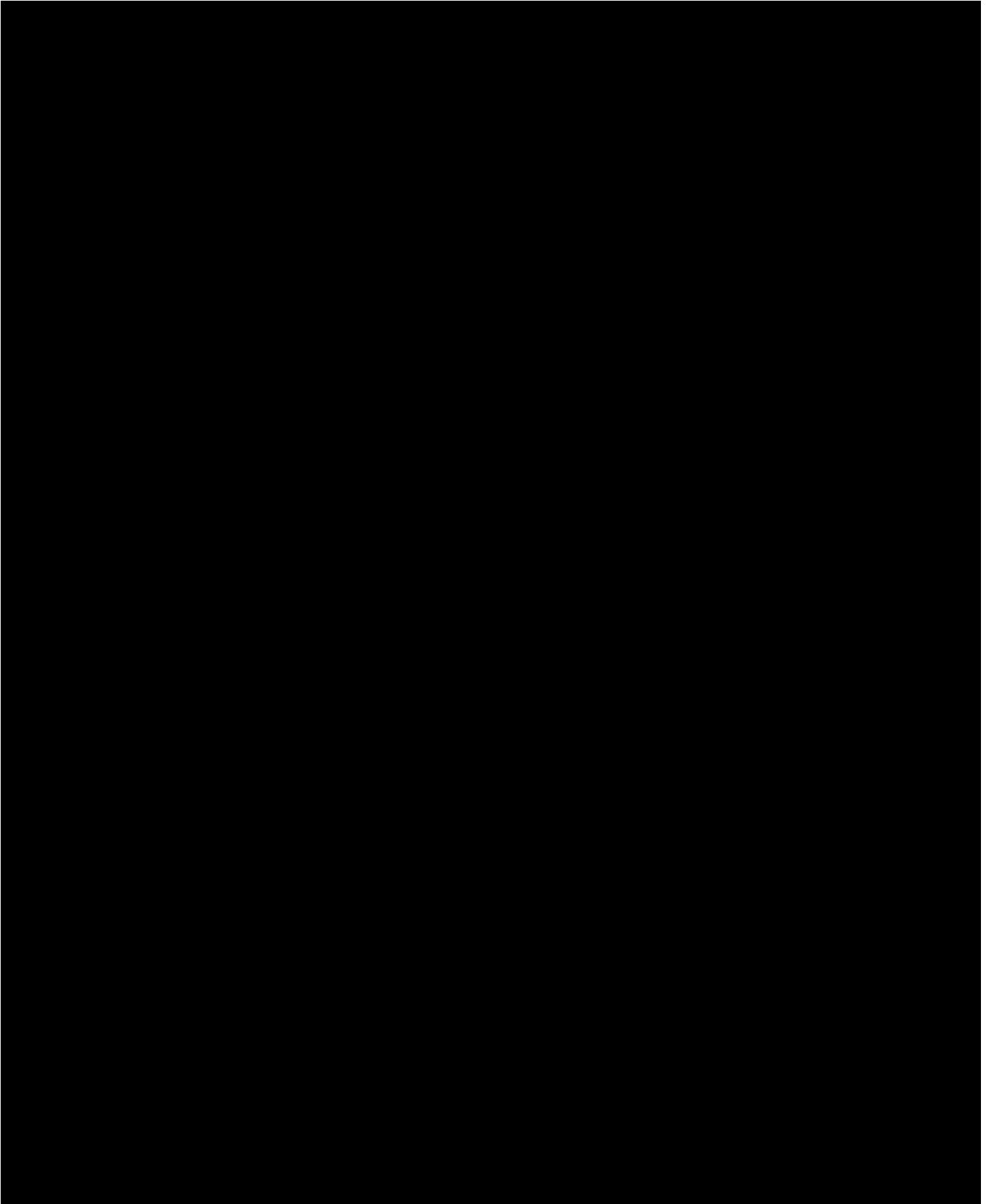


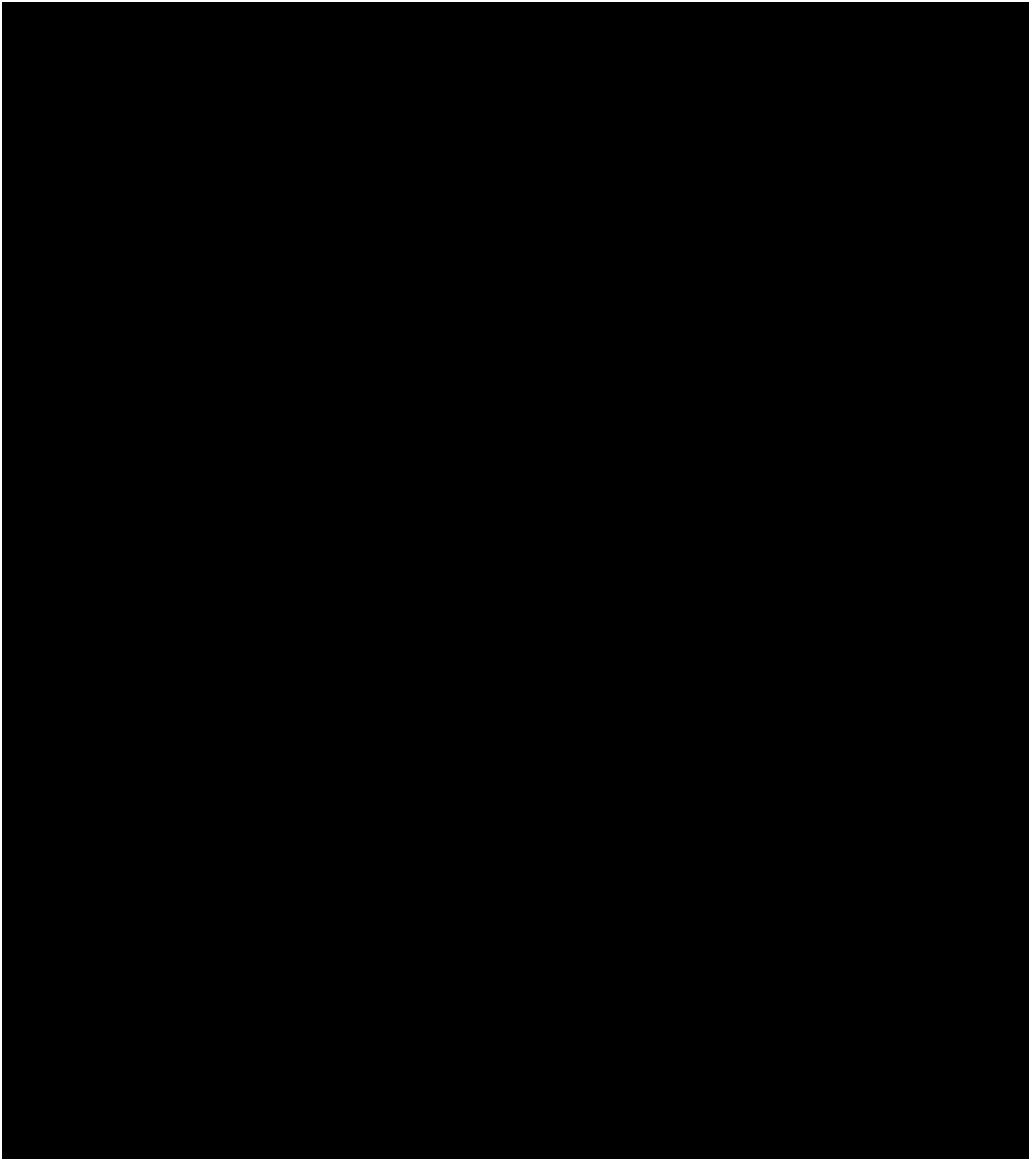


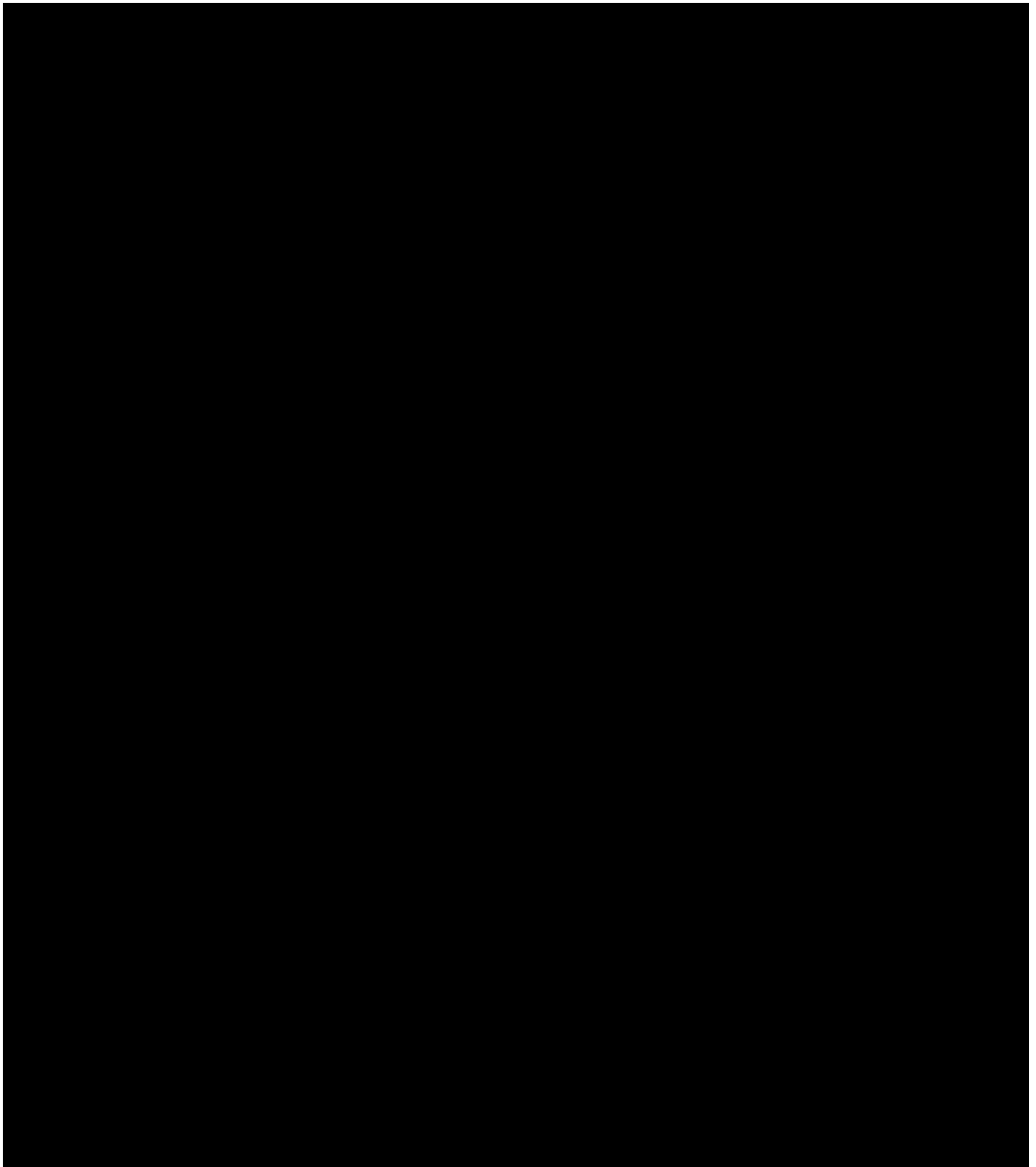


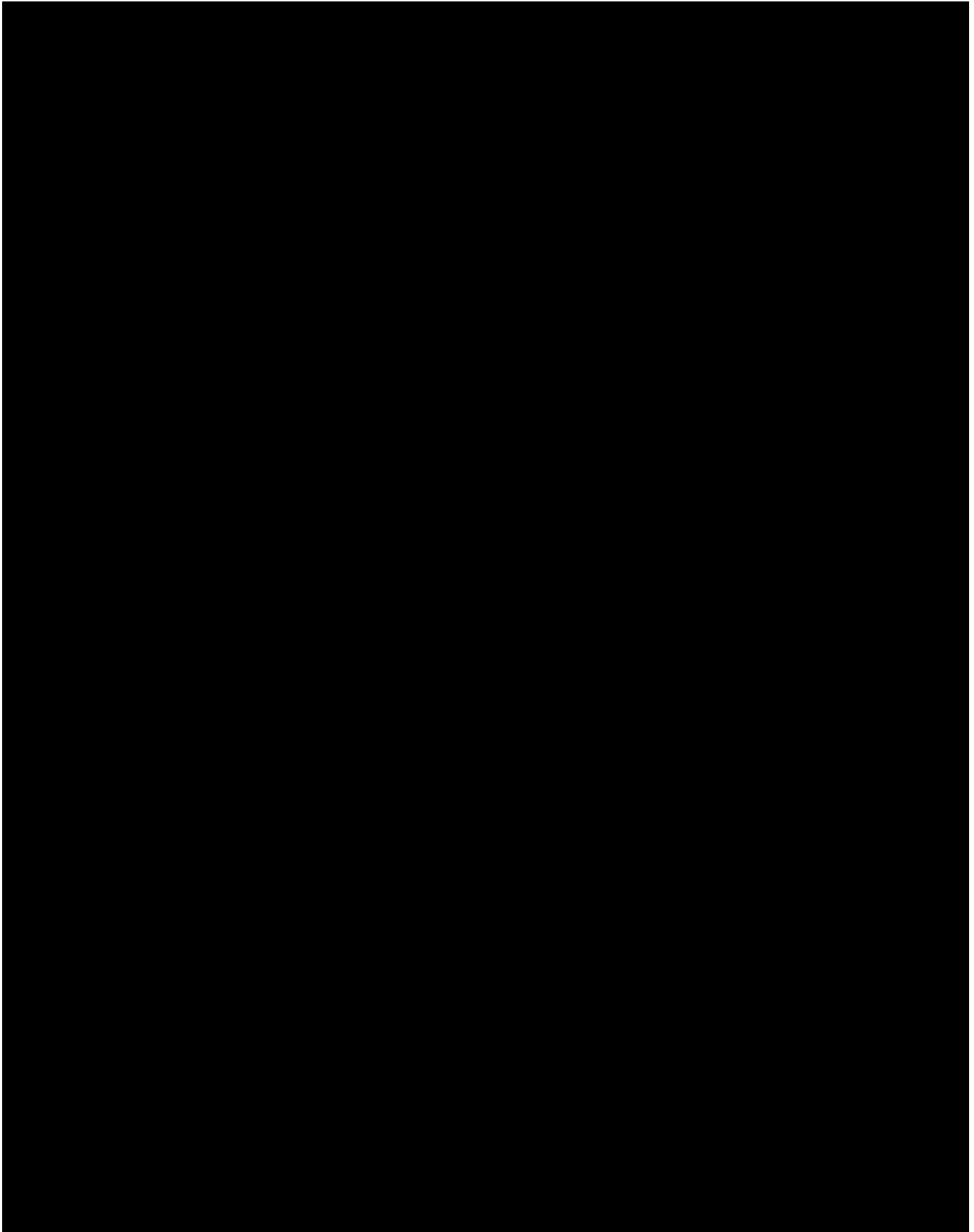


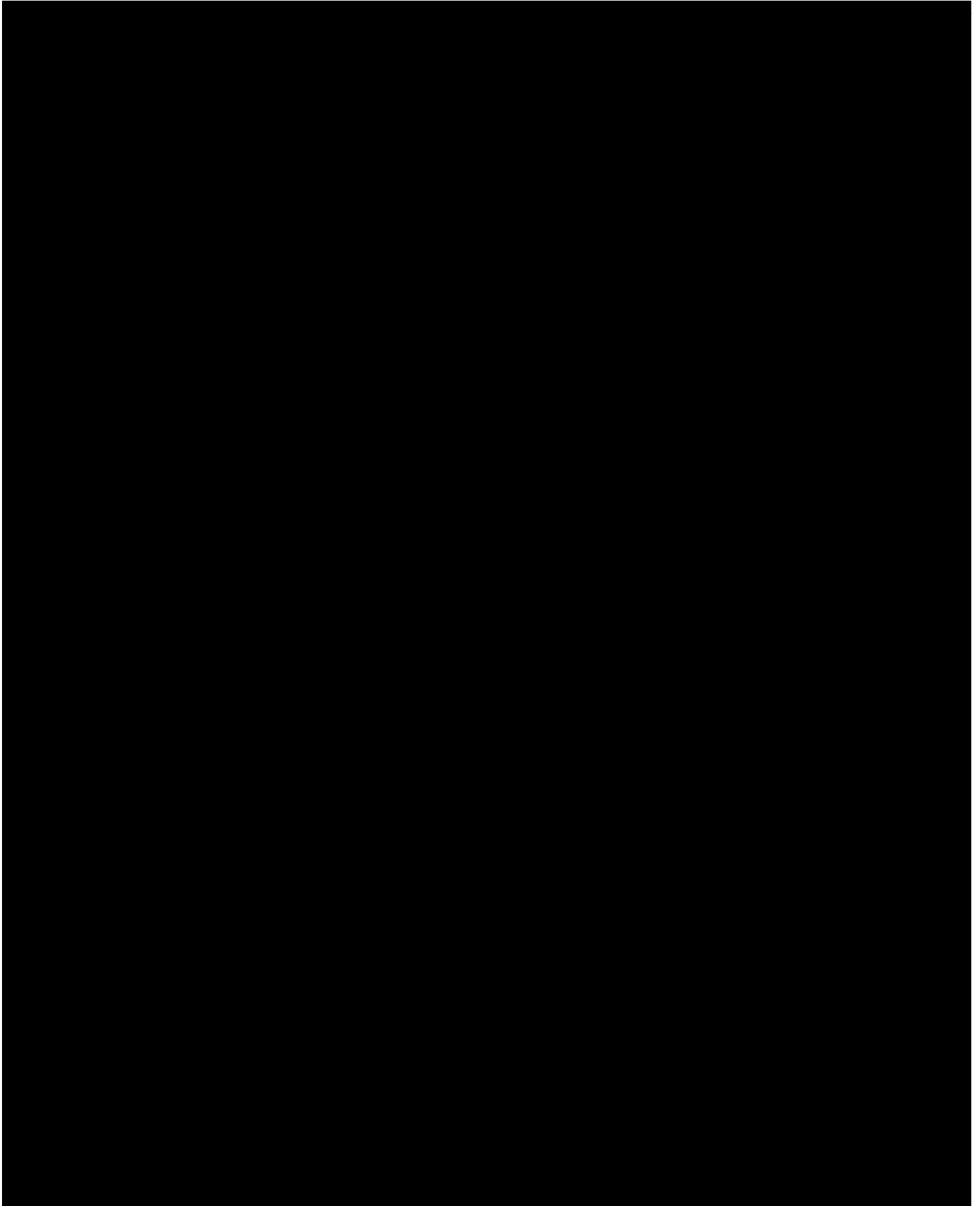


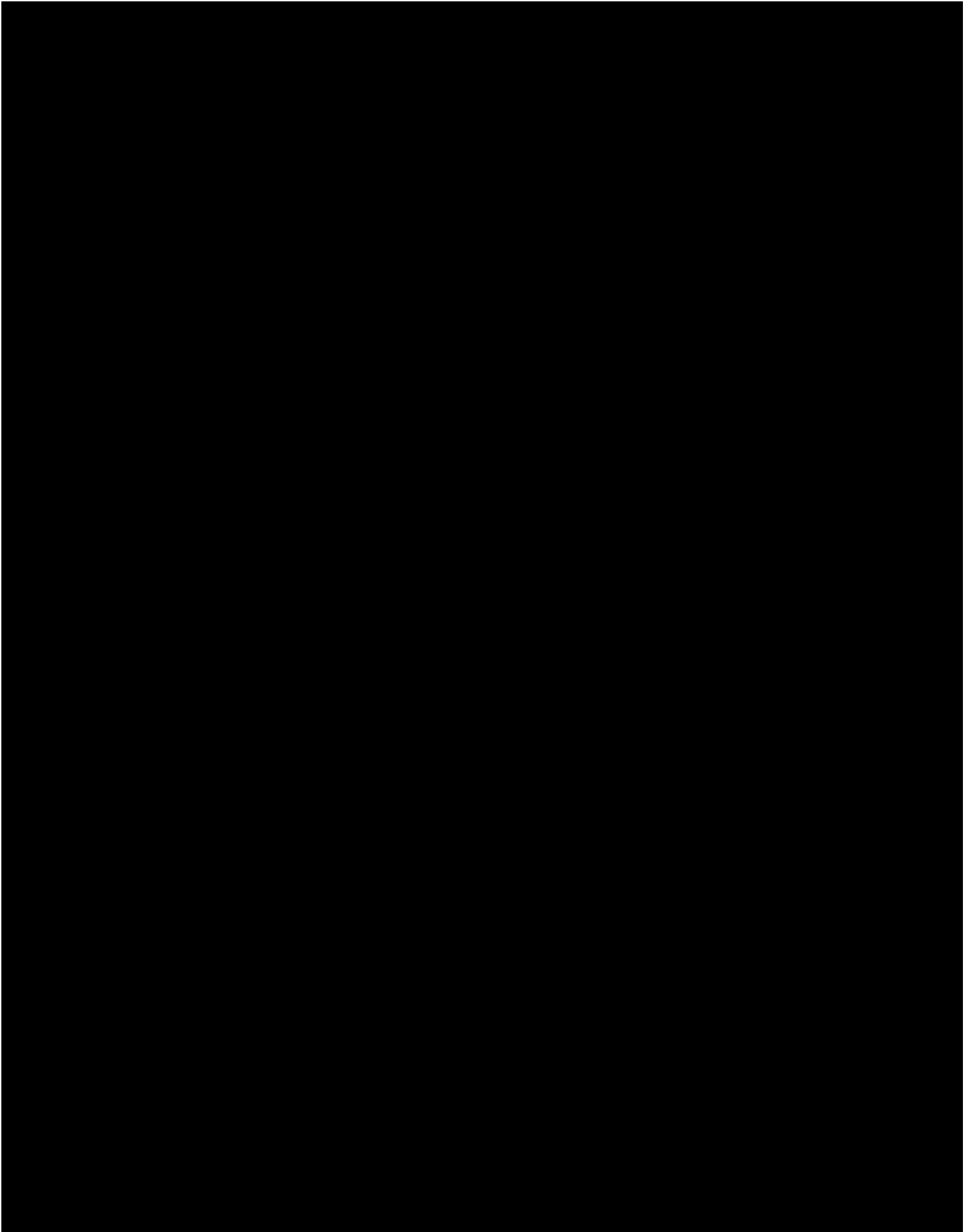


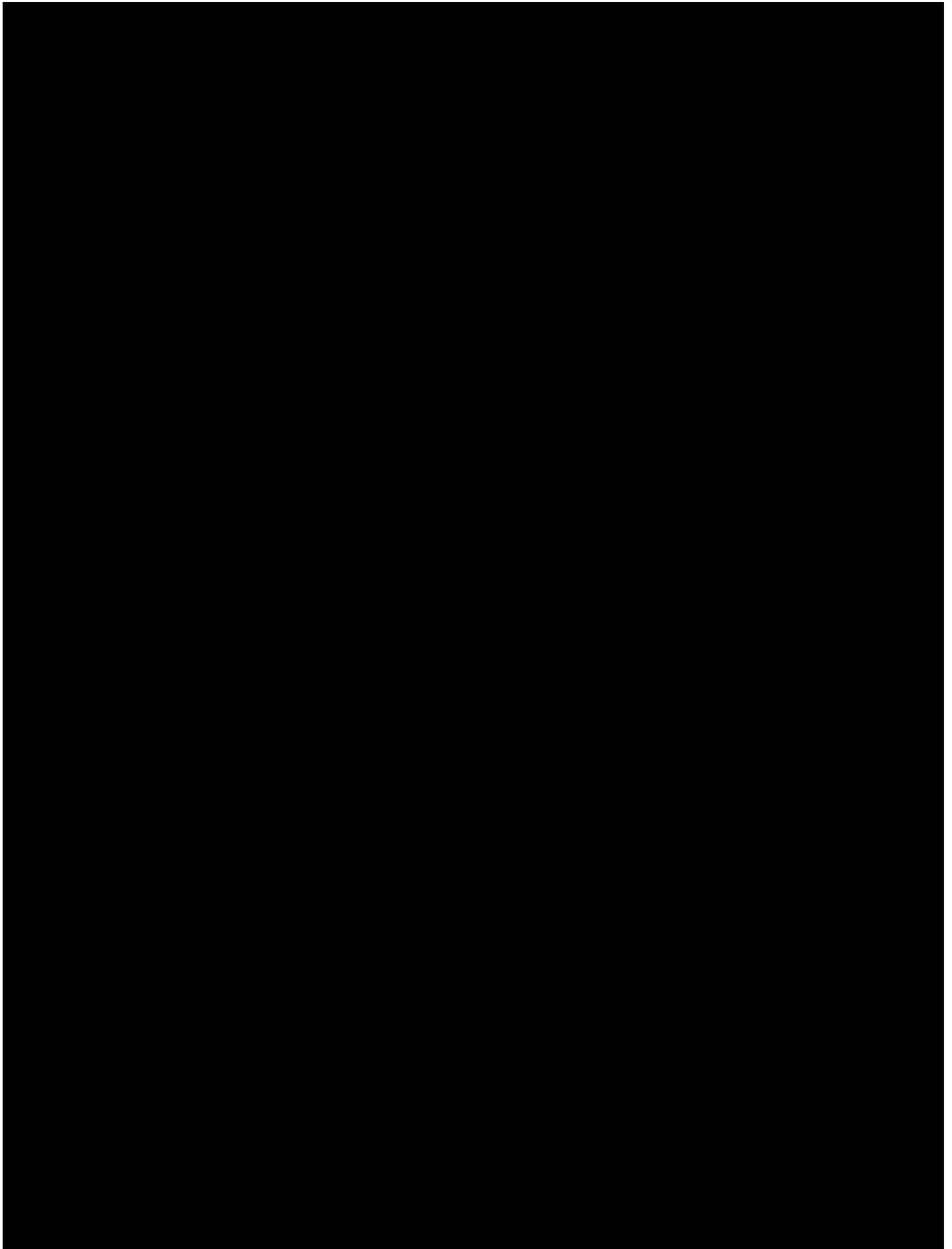


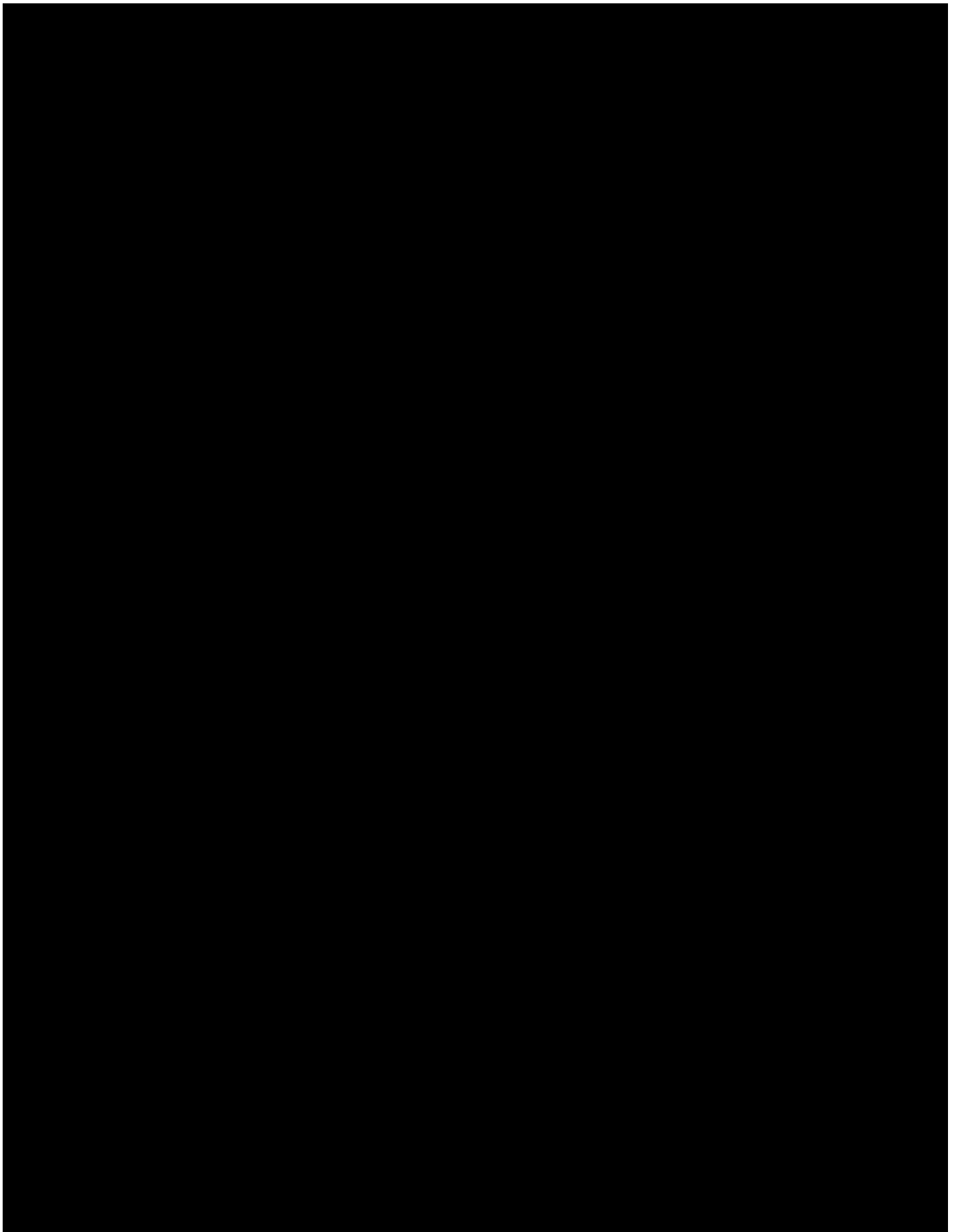


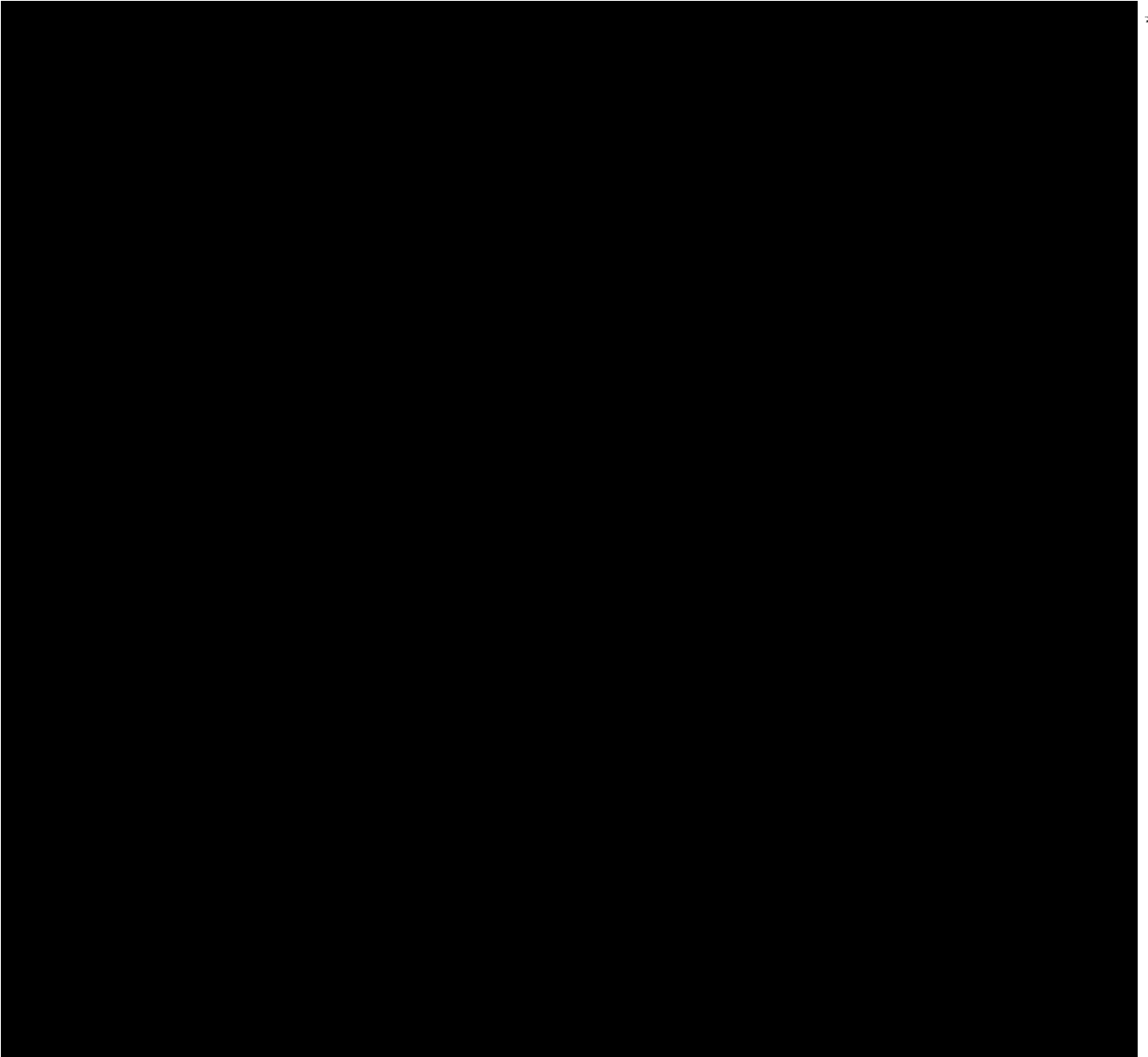


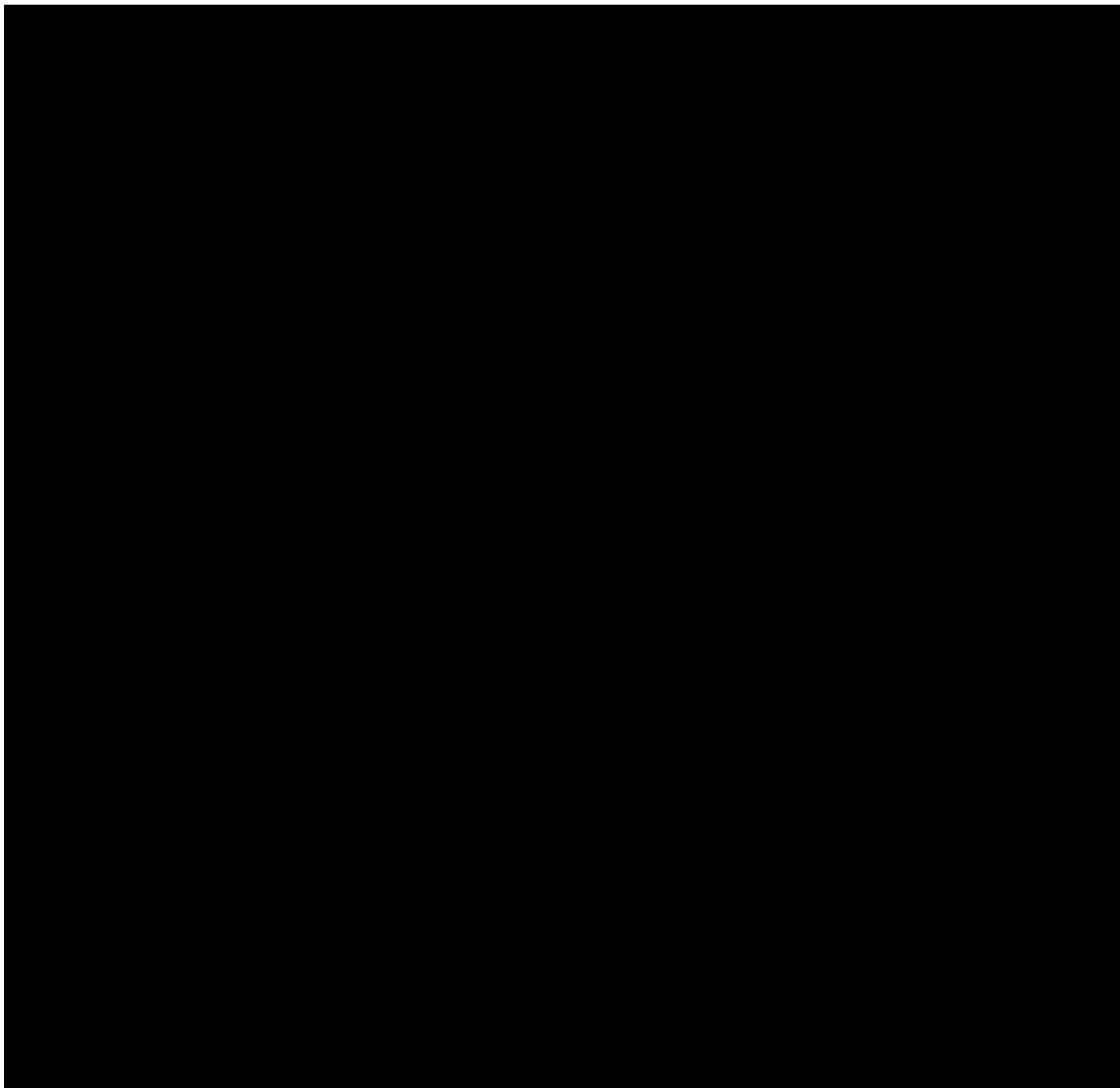


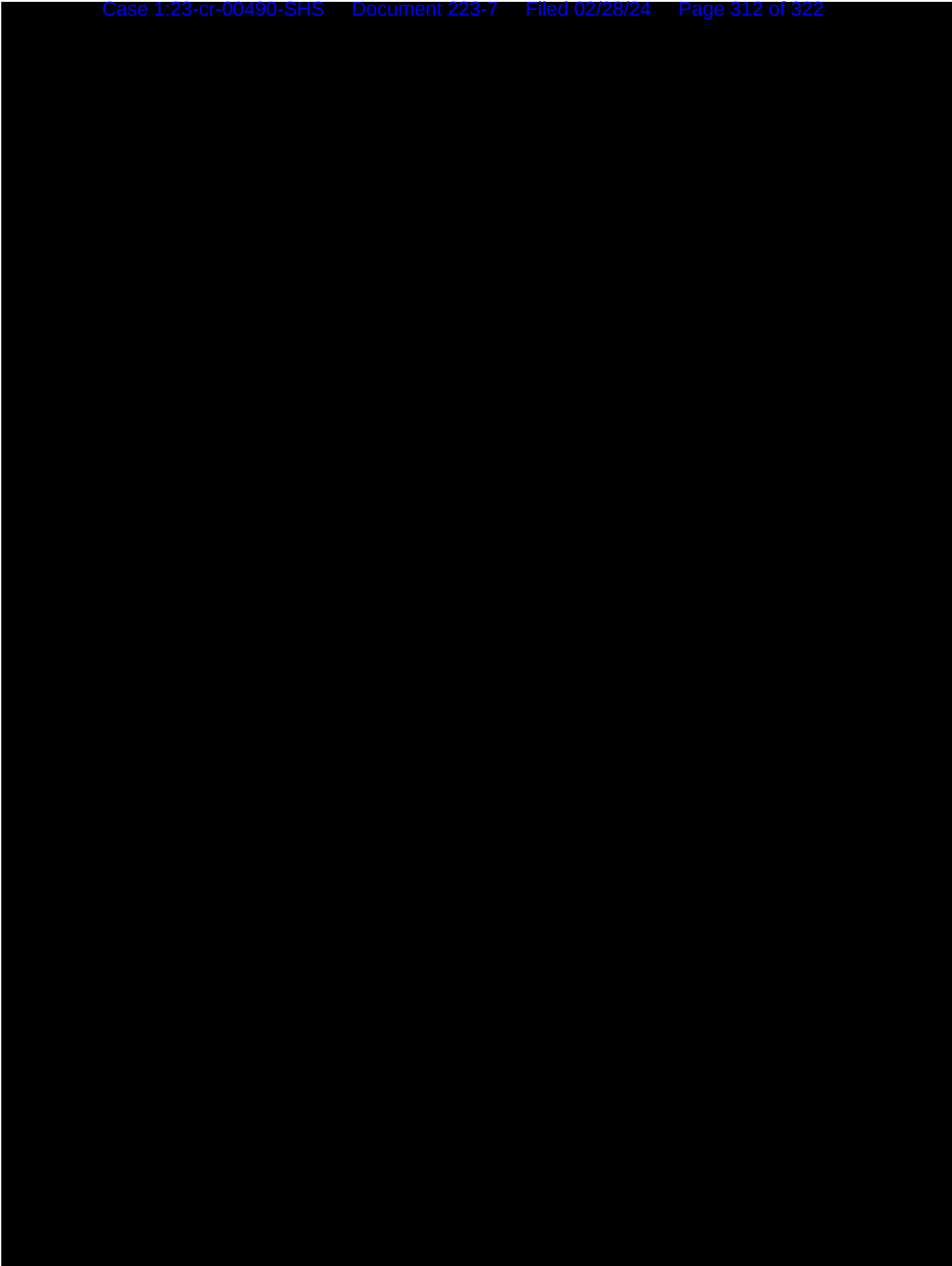


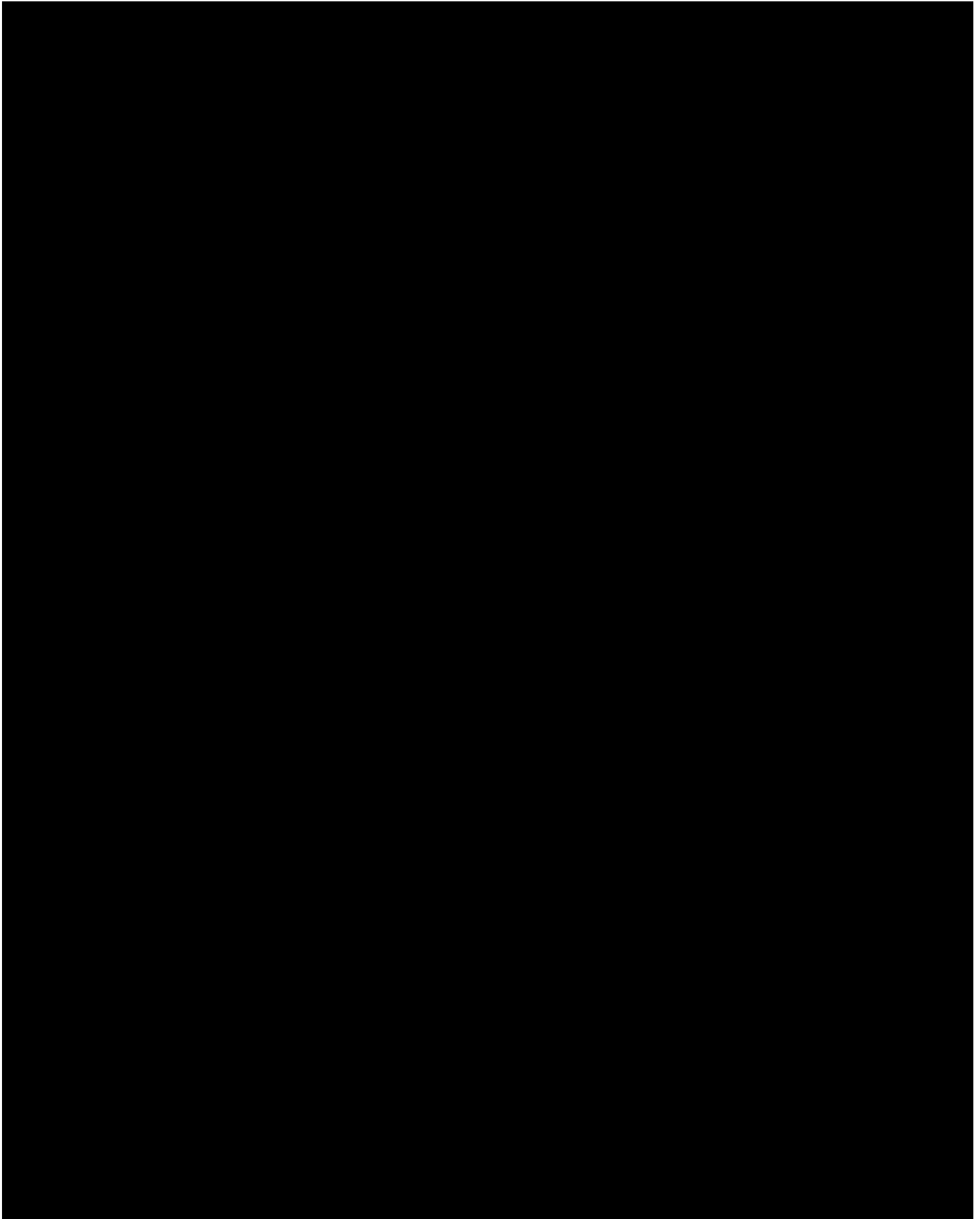


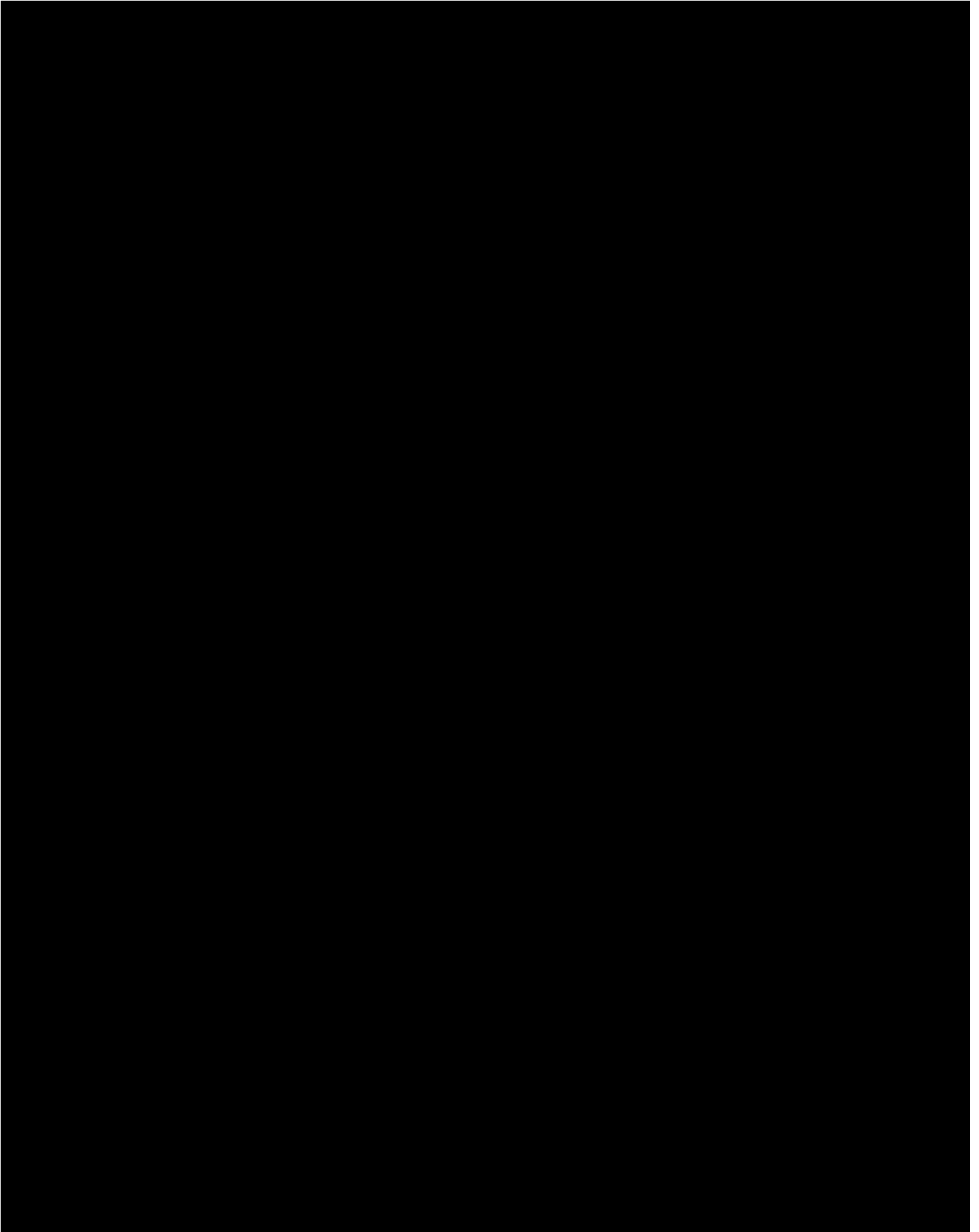




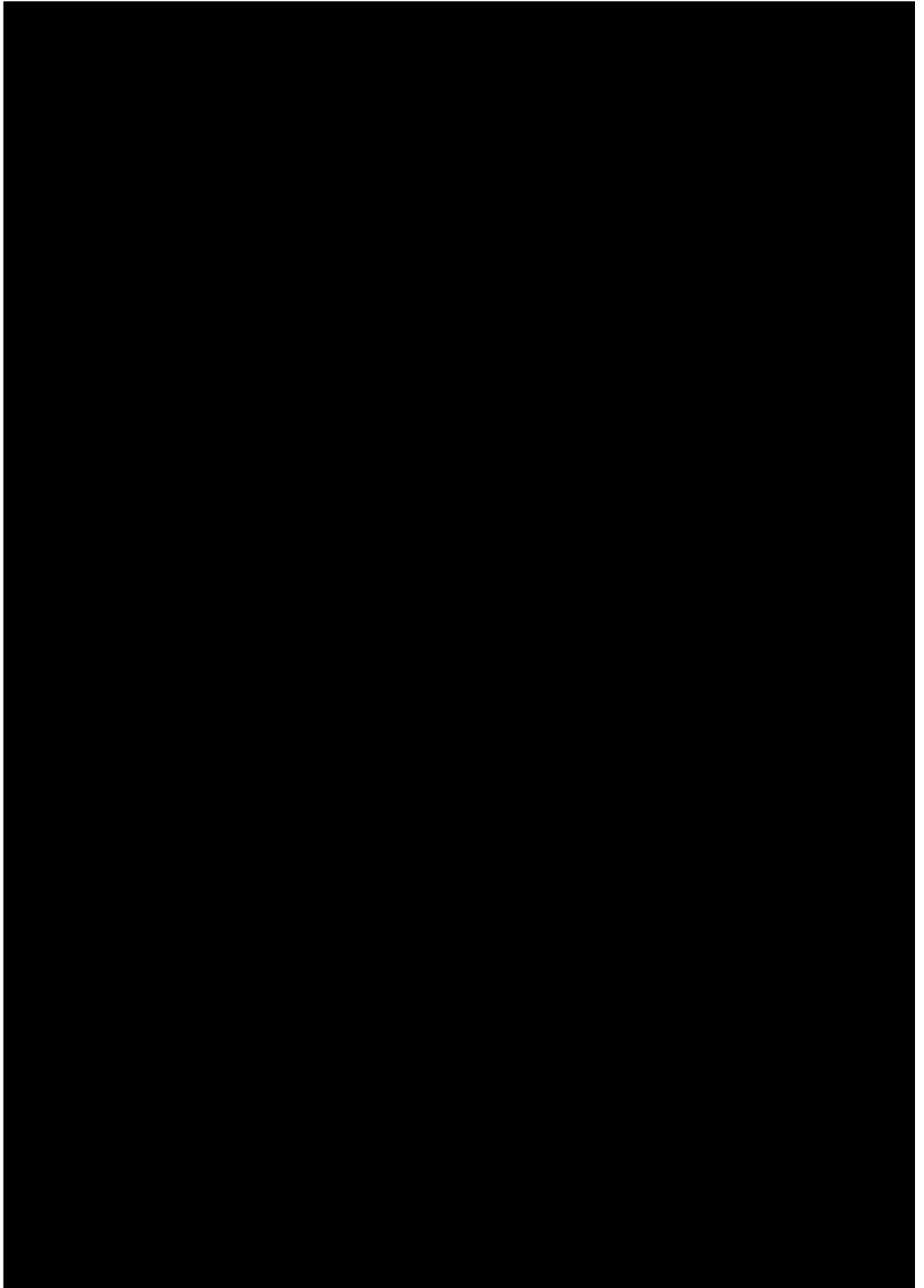


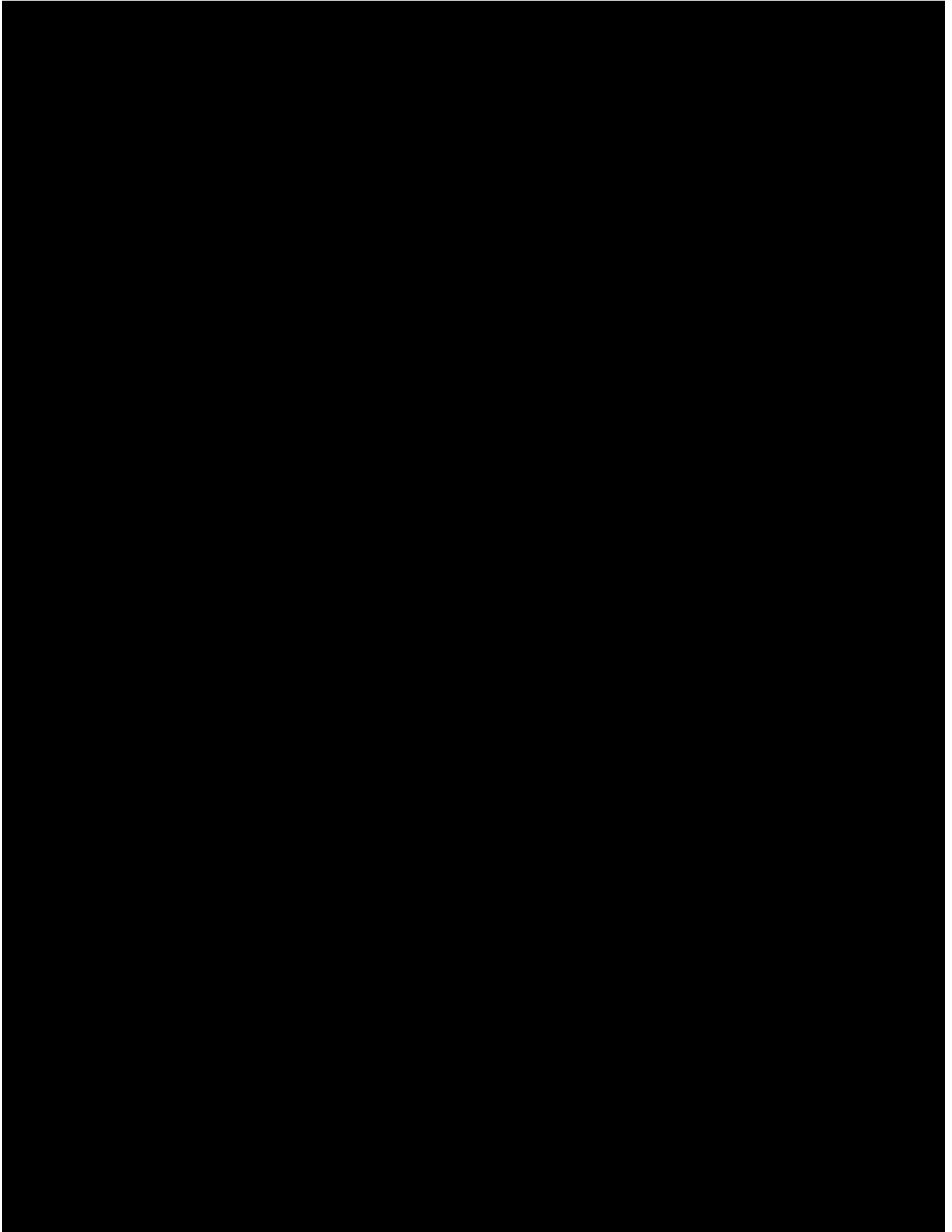






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